

PORTCHESTER BOWLING CLUB
General Data Protection Regulations (GDPR)
Club Privacy Policy Document

Introduction

This policy relates to the personal information (data) of all members of Portchester Bowling Club (PBC) and held by PBC, its security and use. This policy defines the people involved, the data collected by PBC, how it is stored and used internally and externally, and members' rights over that data.

For the purposes of the GDPR:-

- The Data Controller will be the Management Committee of PBC, which will be responsible for the implementation, compliance with and review of this policy.
- The Data Processor will be a committee member who will hold the PBC membership database on their personal computer. They will be responsible for collecting the data, its security, ensuring consent options are recorded and acted upon correctly, and making sure records are kept up to date, including deletion where required.

This Club Privacy Policy Document sets out the commitment of PBC to protect personal data and adhere to the following GDPR principles:-

- Meet its legal obligations as laid down by the General Data Protection Regulations. • Ensure personal data is collected and used fairly and lawfully.
- Process personal data only in order to meet its operational needs or fulfil its legal requirements.
- Ensure personal data is up to date and accurate.
- Establish appropriate retention periods for personal data.
- Provide members with access to their personal data upon request.
- Abide by Article 15, granting members the right to have their personal data erased.
- Provide adequate security measures to protect personal data.

WHAT DATA IS COLLECTED

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The personal data collected is:-

- Full Name
- Postal address
- Telephone number(s)
- Email address

HOW PERSONAL DATA IS USED

The GDPR regulations require organisations to justify the use of personal data and specify which 'Lawful Basis for Processing' is being utilised for each area of data processing.

Membership and Club Management

- Registration and administration of membership
- Statutory notices, for example AGM

The lawful basis for processing data for this purpose is 'Legitimate Interests'.

Matches and Competitions

- Sharing contact details with the Club Captain, Vice Captains or Team Captains to help manage team selections. The lawful basis for processing data for this purpose is 'Legitimate Interests'.

Other Data Sharing

- Publishing name and contact numbers in the PBC clubhouse for the purpose of arranging internal matches.
- Publish names on the website under competitions, honours boards and club officials.

The lawful basis for processing data for this purpose is 'Consent'.

Data will only be shared for these purposes if the member 'opts-in' on the annual GDPR renewal forms.

Email communication and Photographs (to include Social Members)

- Emailing information on PBC events, activities, competitions etc.
- Emailing PBC news and updates.
- Publishing photographs on the PBC website which relate to Club activities.

The lawful basis for processing data for this purpose is 'Consent'.

These communications will not be sent unless the member 'opts-in' on the annual GDPR renewal forms.

WHO WE SHARE PERSONAL DATA WITH

PBC are required to provide the following:-

- A full list of members' names to Bowls England and Bowls Hampshire.
- The names of members registered to play in league competitions within the Portsmouth & District Bowling Association, the Portsmouth & District Women's Bowling Association and the Gosport & Fareham League.
- The names and contact numbers of the Team Captains for any teams playing within such leagues.
- The names, addresses, email addresses and contact numbers of the official PBC contacts for such leagues.
- The names, addresses, email addresses and contact numbers for PBC officials for publication in the relevant year books, manuals and websites.
- The names, email addresses and contact numbers for any members who enter competitions at District, County or National level.

All of the above organisations have their own Data Privacy Policies.

HOW LONG IS PERSONAL DATA HELD

The personal data of PBC members is held for the duration of membership. The data stored will be reviewed annually upon completion of Membership Renewal forms. Out of date and incorrect data will be deleted from the database and will also include back-up copies.

HOW IS PERSONAL DATA STORE

All personal data will be held within the members' database by the Data Processor on a personal computer which must have up to date security software. The computer and database must be password protected. All other PBC officials requiring members' details to carry out legitimate business of the Club will be provided with a spreadsheet containing the relevant information.

THE RIGHTS OF INDIVIDUALS TO CONTROL PERSONAL DATA

The GDPR provides individuals with a number of rights over their personal data. An individual can, at any time:-

- Request details of how personal data is held and how it is used by PBC. This must be provided within one month of the request being received.

- Request that their personal data be updated or deleted. This must be actioned within one month of the request being received.
- Submit a 'Subject Access Request' which will require PBC to provide an individual with a copy of all personal data held for that individual.
- The 'Right to be Forgotten' entitles an individual to have their data erased. PBC understands that failure to fulfil this entitlement will be a violation of GDPR and subject to penalties.

DATA BREACHES

In the event of a data breach posing any kind of threat to members' personal data, PBC will inform the individuals affected by such breach within 72 hours of the breach being identified by the Data Processor or reported to the Data Controller or Data Processor.

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