



The Crouch Bowling Club

Data Protection Policy Incorporating the General Data Protection Regulation (GDPR)

The following policy is based on guidance issued by Sussex County Bowls 2018, relating to the European GDPR.

Purpose

All organisations must work within the remit of the GDPR and should have a policy relating to Data Protection. This policy sets out how the GDPR applies to the way in which The Crouch Bowls Club (TCBC) Collects, Stores, Processes and Deletes the personal data of its members and any volunteers.

TCBC is committed to respecting your privacy and this policy explains how we will do that. All data will be held in a fair, lawful and transparent manor and collected for specific, legitimate purposes and should be accurate and kept up to date. It will be kept only as long as is necessary and will be kept securely.

The TCBC Committee, as “Data Controllers”, will be responsible on a daily operational basis to ensure that TCBC meet the GDPR rules relating to the storage and usage of members personal data.

Collection of Data

Data is collected by TCBC to enable it to fulfil its obligations to the membership. The main way in which data is collected is via Membership Application Forms, when a person applies for membership, or by Membership Renewal each year. In the case of Membership Renewal an opportunity is provided for members to amend the data held by the club. Each member must sign their application or renewal form to confirm their informed consent to TCBC holding personal data about them.

The data held by TCBC is as follows:

Data Name	Legitimate and Lawful Reason for Holding Data
Forenames	To identify member.
Surname	To identify member.
Address	To be able to communicate and post Membership Forms and arrange pick up for matches, between members.
Email Address	To be able to communicate information to members relating to club activities. This is used primarily by the Club Secretary and limited use by other officers of the club as required.
Home Telephone Number	To be able to manage contact with members relating to match and game information being changed at short notice. This will be provided to all members to enable them to liaise with one another regarding matches.



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Mobile Telephone Number	To be able to manage contact with members relating to match and game information being changed at short notice. This will be provided to all members to enable them to liaise with one another regarding matches.
Date of Birth	To record that the member is of an age to give their consent. To confirm eligibility for some matches. To help with specific identification of members and to convey basic information, such as age to a medical team in case of emergency. It may also be used to supply analytics relating to the membership profile, to the committee.
Gender	We record an individual's gender to ensure that communications relating to either a Female only or a Male only matches are communicated in the correct manner.
Emergency Contact Name	This will form part of the information supplied to a medical team in case of emergency. To contact a relative in case of a medical emergency.
Emergency Contact Home Telephone Number	This will form part of the information supplied to a medical team in case of emergency. To contact a relative in case of a medical emergency.
Emergency Contact Mobile Telephone Number	This will form part of the information supplied to a medical team in case of emergency. To contact a relative in case of a medical emergency.
Membership Status - (Full Year, Summer, Winter, Social, Suspended, Left)	To be able to identify members based on their membership status, payments and to aid with more targeted communications. It may also be used to supply analytics relating to the membership profile, to the committee.
Financial payments made	TCBC will retain information relating to membership fees and fees for entry to matches for the season.
Photographs	TCBC may also take photographs of its members undertaking Bowling or Social activities and these may be used both in members Newsletters and on the TCBC Website. Every effort will be made to ensure no members of the public, especially children appear in photographs.
CCTV	The Crouch Bowling Club has CCTV covering its grounds, which is recorded for security and therefore will capture images and video of members whilst they play bowls. These recordings are retained for a period of time and then automatically overwritten. They are not removed or used for any other purposes.



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Website	The website is used to provide information for its members; however, the general public do have access to it. Photographs and video of members playing bowls or taking part in social activities are also displayed on the website to help promote the sport.
Records of matches won, lost or drawn and player performance	These records are retained to enable prizes and cups to be awarded and for match selectors to field the best team. These may also appear on the club website.

Only legitimate relevant data will be collected, processed and stored, as laid out in the table above, provided the member has given their consent to the storage and legitimate use of that data by TCBC for its operations.

TCBC will not use any of its membership data for marketing purposes. However, it may use collective analytical data, such as number of members in a specific category for purposes related to promoting the club in general.

Processing of Data

Processing, covers the collection, usage and disposal of data, whenever data is active or in use it is being processed. Storing and processing of data are closely linked, because in order for data to be stored it first has to be processed.

The same core principles will be applied to both the storage and processing of data. The data captured, is considered to be both relevant and non-excessive to TCBC's operation. However, once the data becomes irrelevant it will no longer be stored and then the only processing that takes place, is its deletion.

No member data will be shared with any 3rd party.

No 3rd party information or advertisement will be sent to members.

General emails to the membership will be sent out using Bcc to prevent the sharing of members email addresses.

For the purposes of clarity, the Data Controller for TCBC is the Club Secretary. They alone store the majority of personal data. The Treasurer will hold the majority of financial information. The Bowling Captains and Competition Secretary will also hold extracts of data dependant on the requirements of their role.



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Storage of Data

All Data collected from 2022 onwards is held in a Microsoft Excel Database's by the individuals listed above on home computers. Due to this the data will be backed up in different ways locally or to Cloud Drive's.

Once a member of the Committee holding one of these roles relinquishes their position and the requirement for them to hold personal member data on their home PC and relevant back up ceases to be necessary, they must delete all data relating to TCBC.

Deletion of Data

The data held by TCBC is to benefit the club member, once that member ceases to be a club member, then the data must be deleted. For the purposes of clarification any data held by TCBC will be deleted when one or other of the following become true.

- A member notifies the Club Secretary that they no longer wish to be a member of the club. Deletion of data will normally take place within 5days of that notification.
- A member fails to renew their membership by the 31st March in the renewal year. Deletion of data will normally take place on 1st May. After this time if a member subsequently wishes to renew their membership, they will have to re-apply as no data will be held for them.

Individual Rights

- Every TCBC member has the right to be informed about what data is being held about them. In general, this will be as detailed above.
- Every TCBC member has a right to view their data. Any request to do this should be made in the first instance to the Club Secretary, by email or in writing. The Club Secretary will respond as soon as is reasonably possible, but no later the 30 days.
- Every TCBC member has a right to rectify their data if it is found to be inaccurate. Again, this should be made in the first instance to the Club Secretary.
- Ever TCBC member has the right to erase their data, in whole or in part or to restrict or object to the processing of their data. However, any request to do so will be put to the Committee at their next monthly meeting for review. As it may be that to grant the request, will mean that the club would no longer be able operate for the member and the individual would therefore have to have their membership terminated.
- Every TCBC member has a right to complain about the use of their data and again any complaint should be sent by email or in writing to the Club Secretary or to the Club President.
- Every TCBC member has the right to complain to the UK Information Commissioner's Office, however we would prefer that you to contact TCBC in the first instance.



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Risk Assessment

Individual Risk Assessments should be carried out on all activities that process personal data to ensure that the risk of breach is ascertained and mitigated.

Reviewing of Policy

This policy should be reviewed by the TCBC Committee every two years.