

# East Williamston Short Mat Bowls Club

## GDPR Policy

### Club Privacy Policy under the General Data Protection Regulations (GDPR) (Updated, 13th October 2021)

#### Introduction

This policy concerns the personal information (data) held by the Club, its security and use. The policy is written in response to the GDPR, in force from 25 May 2018. It defines the people involved, the data collected by the Club, how it is stored and used internally and externally, and members' rights over their data.

#### Use of Data

The Club uses this data solely for the purposes of the effective running of the Club. It also shares the data with the Welsh Short Mat Bowls Association (WSMBA) and Pembrokeshire Short Mat Bowls Association (PSMBA) for their purposes in administering our sport.

#### Control of Data

The Data Controller for the purposes of the GDPR will be the Club through the Committee. They will be responsible for the implementation and review of this policy. Given the nature of data held and Club size, the appointment of a Data Protection Officer is not seen as required; any concerns relating to data protection should be addressed to the Club Chairman, who will fulfil this role.

The Data Processor will be the Club Secretary, who will hold the club membership database on their computer. The Secretary will be responsible for the collection of the data, its security, ensuring that permission for the data to be held, used, and shared as described below is given, and updating of club records including deletion where required.

#### What Data is Collected and Why

We collect all contact and membership details to enable us properly to manage and administer your membership with us, WSMBA and PSMBA. These details include your contact details, date of birth, gender, and details of a contact in case of emergency. This information is lawfully required and collected as a standard part of your application to join or re-join our Club.

The table below summarises the types of data collected and the reasons for collection.

Data Collected	Reason for Collection
Name	This is necessary for legal, insurance and licensing purposes. The Club is entitled to be aware of who is permitted to be on its premises
Address	Required so that club information can be sent to members, who do not have an e-mail address. It also facilitates shared transport arrangements.
Phone Numbers	Home and mobile numbers are requested for contact purposes.
E-mail address	Prime means of communication with members over teams, matches, events and general matters.
Date of Birth	Date of Birth is required to ensure that members are qualified to enter certain competitions.
Gender	Some competitions are gender specific.
Emergency Contact details	In case of accident or sudden illness of a member

## When is the Data Collected and Reviewed?

This data will be captured when a member first joins the Club. The accuracy of the personal information will be reviewed annually when a member renews their membership.

## Who Collects and Holds the Data?

The data is collected by the Club Secretary and held on their computer, which is password protected to ensure the security of the data held.

## Sharing Personal Data outside the Club

Data is shared with the WSMBA and PSMBA, so that they too can properly manage and administer your affiliated membership with them. The data is shared via a Membership Register, the content of which is controlled at all levels by limited and authorised access.

Neither the Club, the WSMBA nor PSMBA permits the sharing of personal data held on the Membership Register to any third party whatsoever. Specifically, personal data will not be released to any other organisation for marketing or communication purposes.

Where direct consent is given by a member, specific and limited information may be published by the Club, WSMBA or PSMBA on their websites and other social media for the purposes of effective appropriate communication within the sport.

## Member's Rights to their Personal Data

Each individual member has the right and the facility to directly access and manage their personal data held on the Membership Register. No one else other than the Club Data Processor has the facility to add or modify personal data. There will be no charge for such access to data. The data held on a member will be deleted within one month of notice that the member has left or is not re-joining the Club.

## Young People's Data

GDPR will set an age for a young person to give their own consent to the collection and storage of their personal data. However, given the WSMBA and PSMBA requirements concerning young people, if any club member is below 18, permission for the collection and use of their data will be sought from the parents/guardians of the young person and only the name of a young person will be used. Any member requiring contact with a young person should approach the Club Secretary to seek agreement for the release of contact details.

## Breaches of Data Security

If at any point a breach of data security is suspected or identified, then that suspicion or fact must be reported immediately (verbally if necessary and confirmed in writing) to the Club Chairman, who is responsible for investigating breaches of security, determining the resultant degree of risk and deciding on the action to be taken, reporting this at the first opportunity to the Committee.

The Club recognises that the requirements of the GDPR apply as much to paper files and records as it does to digital ones and will ensure that any paper records are similarly securely treated. As security issues are much more problematic for paper records, the Club will seek to reduce the use of paper files to the minimum possible. Specifically, membership lists containing personal data will not be displayed on notice boards or the website for public viewing.

## Consent on the Holding and Use of the Data

On applying to join the Club, a member will be given a copy of this policy and asked to confirm that they have read and accept it and that the Club may use the personal data in the proper pursuance of managing their relationship with the member.

In addition, members will be asked to consent to the publication of their name and contact details in the Club Contact Details sheet for communications and so that they and other members can arrange matches as part of Club Competitions.

The Club will seek to always use a bcc system when any e-mails are sent to multiple members.

## Reviews

It is expected that a member will update their personal information if it changes during the year. At the annual subscription renewal, members will be asked to confirm the accuracy of the data held on them. At least every four years, members will be asked to reconfirm their consents as described above.