



Epsom Sports Club

Privacy Policy

1. Introduction

- 1.1 This policy (together with any other documents referred to in it) gives information on how Epsom Sports Club collects and processes your personal data. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.
- 1.2 Epsom Sports Club provides sports facilities and is the umbrella organisation for hockey, cricket, tennis and croquet clubs. When this document refers to “we”, “us” or “our”, we are referring to Epsom Sports Club.
- 1.3 Our contact details are:

Epsom Sports Club

Club Manager: Sarah White

Francis Schnadhorst Memorial Ground,
Woodcote Road,
Epsom,
Surrey
KT18 7QN

sarah.white@epsomsportsclub.co.uk

You have the right to make a complaint at any time to the Information Commissioner’s Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

2. What information will Epsom Sports Club collect about me?

- 2.1 The Club and its constituent sports Sections collects and stores data on its members where it is necessary for our legitimate interests of running a sports club and your interests and fundamental rights do not override those interests.
- 2.2 We will collect data through direct interaction with you. This could be by filling out membership forms or otherwise, submitted by post, phone or email. The data collected will consist of basic personal identity and contact information such as your name, email address, postal address, landline telephone or mobile number, and date of birth, depending on the activity involved.
- 2.3 We will make reasonable efforts to confirm that the data it holds on its members is up to date on an annual basis as part of renewing the membership of these members. Where a member provides notification that any data has changed, this should be updated as soon as possible and any previous data deleted.
- 2.4 We will collect information relating to children (under 18 years) for the purposes of providing activity for junior members of the Sports Club. The information will be as set out in 2.2 for senior members, but, may also include information about medical conditions and seeking consent to take and use photographic and moving images. Both items will enable us to fulfil our welfare and safeguarding obligations and provide a safe environment for all junior participants. As these are special categories of personal data, we will obtain parent/guardian consent to collect and store this information.

3. How will Epsom Sports Club use and store the information it collects from me?

- 3.1 We will use your personal information for the purposes of running the sports club and facilitating the administration and organisation of the sports offered. This could include;
- Contacting you with details of activities of relevant sports teams such as training and matches
 - Contacting you about social activities/events of the individual sports sections within the overall club
 - Contacting you about social or administrative updates that relate to the Sports Club as a whole
 - Providing the Sports Club board and individual club committees with aggregated membership information, such as number of members.
 - Sharing your contact details with membership if you are a team captain or hold a committee position which requires you to be contactable by membership.
- 3.2 With regard to the special categories of data outlined in 2.4, the information will be stored and shared in line with approved safeguarding procedures to support the welfare of junior members.
- 3.3 We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us using the details in Section 1.
- 3.4 If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so, including obtaining your consent if necessary.
- 3.5 Information submitted in hard copy will be stored securely in the Sports Club Managers office
- 3.6 Information submitted in hard copy, along with information submitted electronically will be stored electronically to maintain a list of sports club members. We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those members of the sports club who need to contact members (as per 3.1) as part of their role within the club.
- 3.7 We do not transfer your personal data outside the European Economic Area (EEA).

4. Will Epsom Sports Club share my information with anyone else?

- 4.1 We will keep your information confidential except where disclosure is required or permitted by law (for example to government bodies and law enforcement agencies) or as described in this section.
- 4.2 Membership data may also be shared with Third Parties only to facilitate the purposes outlined in 3.1. This could include sites which facilitate match selection (e.g. Pitchero, Fixtures Live), those which facilitate distribution of communications (e.g. Mailchimp) or Third Parties who provide coaching (e.g. Absolute Tennis).
- 4.3 We will take appropriate measures to satisfy ourselves that any data shared with Third Parties is only used to facilitate club activities. We will seek confirmation that the Third Party providers are compliant with GDPR.

5. How long will Epsom Sports Club keep my information for?

- 5.1 We will only retain your personal data for as long as necessary to fulfil the purpose of its original collection. Information on club members will be retained as long as the individual remains a member of the Club. If an individual does not renew their Club membership their data will be retained for up to three years and then deleted.
- 5.2 For special categories of personal data (such as medical information set out in 2.4) we will delete this data as soon as we become aware an individual is no longer a member of the Club.

6. Subject Access Requests

- 6.1 Any individual may contact us in writing and ask to be provided with all data the Club holds on them. They may also request that their data is deleted or corrected. A full list of rights in relation to personal information is set out in the Appendix. Any Club member who receives such a request should contact the Club Manager in the first instance. This information must be provided with one month of the request being received.

7. Breach process

- 7.1 If at any point any club member becomes aware of a breach of this policy they should notify the Club Manager, who will undertake an investigation in liaison with the relevant Section and Board Data Champion.
- 7.2 Where requested by law, if this breach results in any accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data, then the club shall notify the Information Commissioners Office within 72 hours of it becoming known.

8. Data Champions

- 8.1 We have not appointed a formal Data Protection Officer as we are not required to do so.
- 8.2 However we take our responsibility to manage your personal information in a transparent and secure manner seriously. Each Section of the Club will appoint a Data Champion who will be responsible for ensuring their Section put in place processes to ensure data collected and stored by the club is done so in line with this policy. A Board level Champion will also be appointed to oversee the process for the Sports Club as a whole.

9. Changes to this Policy

- 9.1 This Policy will be reviewed annually by the Sports Club Manager and the respective Data Champions. When we change the Policy in a material way we will update the version number in the footer of the page. It was last updated on 18.05.2018 and will next be updated on 17.05.2019.

Appendix

The lawful basis under which we collect and store your personal data is Legitimate Interest

Legitimate Interest means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us using the details in section 1.

YOUR LEGAL RIGHTS

You have the right to:

Request access to your personal data (commonly known as a “data subject access request”). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data’s accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

