



### Leatherhead Cricket Club Privacy Notice

Leatherhead Cricket Club (hereafter ‘the Club’) take the protection of the data we hold about you as a member seriously and are committed to respecting your privacy. This notice is to explain how your data is used, collected and stored. We must also inform you of your rights and our responsibilities to you. This document should be read in conjunction with our Data Protection Policy.

#### **What does this policy cover?**

This policy describes how The Club makes use of the data we handle in relation to our members and players, including our use of Play-Cricket provided by the England and Wales Cricket Board (“ECB”). It also describes your data protection rights, including a right to object to some of the processing which we carry out. More information about your rights, and how to exercise them, is set out in the “What rights do I have?” section.

#### **Summary of how we and the ECB (where applicable) use your data**

- The Club uses your personal data to manage and administer your membership and your involvement with the club and its teams, and to keep in contact with you for these purposes;
- Some data is shared with the ECB and Surrey County Cricket Club, who use your data to regulate, develop and manage the game;
- Some data is also shared with the Surrey Championship, MidSurrey, West Surrey and other leagues for the purposes of participation in cricket leagues and competitions;
- Where we or the ECB rely on your consent, such as any consent we seek for email marketing, you can withdraw this consent at any time;
- Amongst the data we collect from you may be medical (including injury) information. We will hold this where you (or your parent) have given consent, so that we can ensure we are aware of your condition and can ensure that you are supported appropriately;
- Where you work in a particular role within the game, for example coaching, you may be required to undergo a Disclosure & Barring Service check using the ECB’s eDBS system. The result of this check will be retained in The Club’s records;

#### **What information do we collect?**

We collect and process personal data from you or your parent when you join and when we carry out annual renewals of your membership. This includes:

- your name;
- your gender;
- your date of birth;
- your Play-Cricket ID (if applicable);
- your home address, email address, phone numbers and emergency contact details;
- your type of membership and involvement in particular teams, or any key role you may have been allocated, such as Chair, Membership Secretary, Coach, Team Manager or Administrator, Club Welfare officer etc.;
- your payment and/or bank account details, where you provide these to pay for membership;
- your marketing preferences, including any consents you have given us;
- your medical conditions or disability;
- video/photography agreement; and
- participation agreement.

### **What information do we receive from third parties?**

Sometimes, we receive information about you from third parties. For example, if you are a child, we may be given information about you by your parent/guardian. We may receive information relating to your existing registrations with other clubs or cricket bodies or disciplinary history from the ECB or relevant cricket leagues. Additionally, for certain role holders or those working with children, we may receive information from the Disclosure and Barring Service and the ECB on the status of any DBS check you have been required to take.

### **How do we use this information, and what is the legal basis for this use?**

We process this personal data for the following purposes:

1. To fulfil a contract, or take steps linked to a contract. This is relevant where you make a payment for your membership and any merchandise and includes:
  - taking payments;
  - communicating with you;
  - providing and arranging the delivery or other provision of products, or services;
  - claiming Gift Aid on any donations.
2. As required by the Club to conduct our business and pursue our legitimate interests, in particular:
  - we will use your information to manage and administer your membership and your involvement with the Club and its teams, and to keep in contact with you for these purposes;
  - We will also use data to maintain records of our performances and history, including match reports, score books and team sheets, including online records on the ECB's Play-Cricket sites;
  - We may choose to send you promotional materials and offers by email where we want to send you offers relating to similar products and services that you have already bought, for example in relation to coaching sessions or social events.
3. Where you give us consent:
  - We may send you promotional material by email;
  - we may handle medical or disability information you or your parent provides to us, to ensure we support you appropriately;
  - On other occasions where we ask you for consent, we will use the data for the purpose which we explain at that time.
4. For purposes which are required by law:
  - we maintain records such as health and safety records and payment and accounting records to meet specific legal requirements;
  - We also ensure, where you will work with children, that you have undergone an appropriate DBS check.

### **How does the ECB use any of my information?**

The ECB provides Play-Cricket, but makes its own use of the following information:

- your name;
- your gender;
- your date of birth;
- your ID (as assigned in Play-Cricket);
- your home address, email address and phone number; and
- your type of membership and involvement in particular teams at the Club, or any key role you may have been allocated, such as Chair, Membership Secretary, Welfare officer, Coach etc.

The ECB (and Surrey County Cricket Club ("SCCC")) use this information as follows:

1. As required by the ECB to conduct its business and pursue its legitimate interests, in particular:
  - communicating with you or about you where necessary to administer Cricket in England, including responding to any questions you send to the ECB about Play-Cricket;

- administering and ensuring the eligibility of players, match officials and others involved in cricket – this may involve the receipt of limited amounts of sensitive data in relation to disabled players, where they are registered for a disabled league or team, or in relation to anti-doping matters;
  - maintaining records of the game as played in England, maintaining details of discipline and misconduct;
  - monitoring use of Play-Cricket, and using this to help it monitor, improve and protect its content and services and investigate any complaints received from you or from others about Play-Cricket;
  - maintaining statistics and conducting analysis on the make-up of cricket's participants;
  - ensuring compliance with the current Laws of Cricket and Regulations including those on the affiliation of clubs, constituent bodies and leagues, and registration of players; and
  - communicating with you to ask for your opinion on ECB or SCCC initiatives.
2. For purposes which are required by law:
- The ECB will ensure, where you will work with children and where this is required, that you have undergone an appropriate DBS check – this is also carried out with your consent;
  - The ECB may respond to requests by government or law enforcement authorities conducting an investigation.

#### **Withdrawing consent or otherwise objecting to direct marketing**

Wherever we rely on your consent, you will always be able to withdraw that consent, although we may have other legal grounds for processing your data for other purposes, such as those set out above. In some cases, we can send you direct marketing without your consent, where we rely on our legitimate interests. You have an absolute right to opt-out of direct marketing, or profiling we carry out for direct marketing, at any time. You can do this by following the instructions in the communication where this is an electronic message, or by contacting us using the details set out below.

#### **Who will we share this data with, where and when?**

In addition to sharing data with the ECB, we may share your data with a variety of other organisations, as set out below.

Some limited information may be shared with other stakeholders in cricket, such as other clubs, constituent bodies, and league organisers, so that they can maintain appropriate records, register players as appropriate, and assist us in organising matches and administering the game.

Personal data may be shared with government authorities and/or law enforcement officials if required for the purposes above, if mandated by law, or if required for the legal protection of our or the ECB's legitimate interests in compliance with applicable laws.

Personal data will also be shared with third party service providers, who will process it on our behalf for the purposes identified above. Such third parties include the ECB as the provider of Play-Cricket, and Pitchero as the provider of the Club website.

#### **What rights do I have?**

You have the right to ask us for a copy of your personal data; to correct, delete or restrict (stop any active) processing of your personal data; and to obtain the personal data you provide to us for a contract or with your consent in a structured, machine readable format.

In addition, you can object to the processing of your personal data in some circumstances (in particular, where we don't have to process the data to meet a contractual or other legal requirement, or where we are using the data for direct marketing).

These rights may be limited, for example if fulfilling your request would reveal personal data about another person, or if you ask us to delete information which we are required by law to keep or have compelling legitimate interests in keeping.

You have the same rights for data held by the ECB for its own purposes on Play-Cricket.

To exercise any of these rights, you can get in touch with us – or, as appropriate, the ECB or its data protection officer – using the details set out below. If you have unresolved concerns, you have the right to complain to the Information Commissioner's Office.

Much of the information listed above must be provided on a mandatory basis so that we can make the appropriate legal checks and register you as required by ECB Rules and Regulations. Some information is optional, particularly information such as your medical information. If this is not provided, we may not be able to provide you with appropriate assistance, services or support. If you make use of any of the rights above, and put in a request to the Club, we must process your request within one calendar month, free of charge. We can request more time, and payment, if the request is particularly difficult. We can also ask for the request to be rejected, as noted above.

#### **What happens if you lose my data, or the data is stolen?**

Data breaches, as they are known, are highly serious. A breach is described as 'a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data.' In any of these circumstances, If the breach is small, we will record the event and conduct a thorough investigation of our own processes. If the breach is large, we will inform the Information Commissioner within 72 hours of the breach, and also inform you. We will then investigate the incident in conjunction with the ICO.

#### **How do I get in touch with you or the ECB?**

If you have any concerns about how we process your data, or would like to opt out of direct marketing, you can get in touch with the Club's Membership Secretary. The current contact details for the Membership Secretary, Jim Greig are:

[leatherheadccmembers@gmail.com](mailto:leatherheadccmembers@gmail.com)

If you have any concerns about how the ECB processes your data, you can get in touch at:

[privacy@ecb.co.uk](mailto:privacy@ecb.co.uk)

#### **How long will you retain my data?**

We process most of your data for as long as you are a member of the Club and for 2 seasons after this. If personal data is held with your consent, e.g. medical information, we process data for as long as you are a member of the Club and for 2 seasons after this unless you ask us to stop. Where we process personal data for marketing purposes, we process the data unless you ask us to stop, when we will only process the data for a short period after this (to allow us to implement your requests). We also keep a record of the fact that you have asked us not to send you direct marketing or to process your data indefinitely so that we can respect your request in future.

We will retain information held to maintain statutory records in line with appropriate statutory requirements or guidance.

The ECB will maintain records of individuals who are registered on Play-Cricket, records of DBS checks and the resulting outcomes and other disciplinary matters for such period as is set out in the ECB's privacy notice to be set out on [www.ecb.co.uk](http://www.ecb.co.uk)