

## GDPR & Privacy Policy

Fleet and Ewshot Hockey Club (also referred to as “FEHC”, “the Club”, “we” or “us”) is committed to protecting and respecting your personal data and privacy.

We need to collect your personal data for the purposes of running FEHC. You are entitled to know what information we collect and how we use it. If you have any questions about the data and why we collect it, then this document provides an introduction, but further information about this can be obtained from the Club Secretary you can always ask. You can even refuse our use of your data, but this may have an impact on what you do at FEHC.

For the purpose of the General Data Protection Regulation (“GDPR”), this policy sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us.

Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

The GDPR states that the personal data we hold about you must be:

1. Used lawfully, fairly and in a transparent way.
2. Collected only for valid purposes that we have clearly explained and not used in any way that is incompatible with those purposes.
3. Relevant to the purposes we have told you about and limited only to those purposes.
4. Accurate and kept up to date.
5. Kept only as long as necessary for the purposes we have told you about.
6. Kept securely

### Summary of how we use your data

- FEHC uses your personal data to manage and administer your membership and your involvement with its teams and Club, and to keep in contact with you for these purposes. This will typically be to contact members, teams, role holders, parents, other groups within hockey. It can often include venues, dates, and times for training, matches or other activities.
- Some data is shared with the EH (England Hockey) who use your data to regulate, develop and manage the game. They will not usually ask for names, but genders, ages or types of hockey played i.e. high level, club, mixed, veterans, juniors, indoor etc.
- We hold your personal data in Google Docs, with access restricted to those who need to use your personal information for their role within the Club for the purposes of administrating playing of hockey (which includes matches, training, etc).
- We will contact you via Pitchero and email. We will use the email address that you (or your parent) have supplied for your contact information. If you withhold your email address or do not use Pitchero, then we may not be able to accept your request to join FEHC.
- Facebook
  - We use Facebook as a means of sharing news and information about activities within the Club. These will normally be Closed groups and will require you to opt into membership of the group. We will not allow anyone under the age of 13 years old to join a Facebook group. You can leave the group(s) any time, with no impact on your playing for FEHC.

- There may be informal groups on Facebook relating to FEHC. These are not the responsibility of the Club.
- We have a club Instagram account which is used to promote the Club to a wider audience. No personal data is shared on that account
- There may be ad-hoc communications within groups of players, parents, coaches, etc using other social media apps (e.g. WhatsApp). FEHC does not have any control of the information shared through these platforms and their use is not endorsed by the Club.
- As a club we have a few social events. We will ask for your consent to contact you using your personal data about these, i.e. you opt in to receive this information. You can opt-out at any time, with no implications on playing for FEHC.
- As a club we may send you relevant marketing information (e.g. from EH about future events). We will ask for your consent to send these to you using your personal data, i.e. you opt in to receive this information. You can opt-out at any time, with no implications on playing for FEHC.
- Aspects of your data where relevant are also shared with other bodies involved in the administration of hockey. These would include the county and regional associations, and umpire associations, and leagues. What information is shared will depend on several factors. Before sharing your information, we will make you aware of what we are doing.
- 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 that you are supported appropriately.
- Where you work in a particular role within the game, you may be required to undergo a Disclosure & Barring Service check.

ALL THESE EXTERNAL BODIES WILL HAVE THEIR GDPR OBLIGATIONS TOWARDS US, AND THESE ARE ADDRESSED BY US DIRECTLY TO THEM

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

This policy describes how Fleet and Ewshot Hockey Club (England Hockey referred to as “EH”) will make use of the data we handle in relation to our members and players.

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.

### **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 contact information (home address, email address and phone number);
- for those under 18 years old, we will require your parent/guardian contact information;
- your type of membership and involvement with specific teams;
- your involvement with key role you may have been allocated, such as Chairman, Safeguarding Officer, Membership Secretary etc.;

- your medical conditions or disability, where you provide this to us with your consent (or your parent's consent) to ensure we are aware of any support we may need to provide to you.

Some information may sometimes be required in exceptional circumstances i.e. where you or your child are involved with disciplinary issues or incidents on and off the pitch, or perhaps where there is a health and safety issue, and third parties like emergency services are involved.

### **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 parents.

We may receive information relating to your existing registrations with other clubs or bodies or disciplinary history via EH, regional or local bodies. Additionally, for certain role holders or those working with children, we may receive information from the Disclosure and Barring Service and EH 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:

- 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 or enter a competition. This includes:
  - communicating with you;
  - providing and arranging the delivery or other provision of products, prizes or services;
- 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 its teams and club, 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 lines and team sheets;
- Where you give us consent:
  - 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.
- For purposes which are required by law:
  - we maintain records such as health and safety records and accounting records in order to meet specific legal requirements;
  - we ensure, where you will work with children, that you have undergone an appropriate DBS check – this is also carried out with your consent.
  - where you hold a role at the Club requiring us to check your right to work, we may process information to meet our statutory duties;
  - we may respond to requests by government or law enforcement authorities conducting an investigation.

### **How does EH, Regional and Local Hockey Associations use my information?**

The Club may share your personal data with EH, Regional or Local Hockey Associations. The information we will share is:

- your name;
- your gender;
- your date of birth;
- your type of membership and involvement in particular teams at the Club, or any key role you may have been allocated, such as Chairman, Safeguarding Officer, Membership Secretary etc.

Before sharing the information with a third party, FEHC will understand why the personal data needs to be shared and how it will be protected.

If you need further information about what information of yours has been shared with a third party, please contact the Club Secretary

### **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.

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

In addition to sharing data with the EH, we will share your data with The Southern Counties Hockey Association, Hampshire Hockey Association and Umpires Association, Google Docs, Pitchero.

Specifically, we will share your attendance at a training session or match with England Hockey. This is subject to the England Hockey rules for playing while in Covid-19 pandemic is in place. Data held by England Hockey is limited to name, time of activity and location. In the event that an attendee tests positive for Covid-19 your contact information will be shared the government authorities for the purpose of tracking the potential outbreak.

Some limited information may be shared with other stakeholders in hockey, such as other clubs, Constituent Bodies, league organisers, so that they can maintain appropriate records 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 EU's legitimate interests in compliance with applicable laws.

Where information is transferred outside the EEA, and where this is to a stakeholder or vendor in a country that is not subject to an adequacy decision by the EU Commission, data is adequately protected by EU Commission approved standard contractual clauses, an appropriate Privacy Shield certification or a vendor's Processor Binding Corporate Rules. A copy of the relevant mechanism can be provided for your review on request.

### **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.

To exercise any of these rights, you can get in touch with the Club Secretary using the details set out below. Where your concerns about the way a third party has used your data then you should contact the relevant data protection officer for the third party. If you have unresolved concerns, you have the right to complain to the Information Commissioner's Office.

We will inform you which information is mandatory when it is collected. 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.

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

Should you have any concerns or questions about how we use your personal data then please contact the Club Secretary at [secretary@fleethockey.com](mailto:secretary@fleethockey.com) or the Club Chairman at [chairman@fleethockey.com](mailto:chairman@fleethockey.com)

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

We process the majority of your data for as long as you are an active member and for 18 months beyond this, unless you ask us to stop. For any financial data, we are legally obliged to keep records of any financial transaction for 6 years after the date of transaction.

Where we process personal data in connection with performing a contract or for a competition, we keep the data for 6 years from your last interaction with us.

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

Records of your involvement in a particular match, on team sheets, on results pages or in match reports may be held indefinitely both by us or the associated leagues or bodies in order to maintain a record of the game.

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#### **Update History**

29 Oct 2019: Original Version/Alan Dow

17 Aug 2020: Updated/Alan Dow  
Replace references to Teamer with Pitchero  
Added paragraph about sharing attendance with EH for Track & Trace purposes