



Privacy Policy – Players, Coaches & Medical Staff

If you have any questions about the protection of your data, please email our Data Protection Officer: dpo@richmondrc.co.uk

The purpose of this Privacy Notice is to inform you how and why your data is used when you play for us or you are part of the playing support teams at RFCL. This notice applies to all playing sections of the club:

- **First XV squad & all of the Mens Sections including the Heavies**
- **Womens Section**
- **Youth section**
- **Mini Section**

We operate as Data Controllers for the information you provide to us and Joint Data Controllers with the RFU and the medical organisations involved in your medical treatment and fitness to play.

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Taking your Data Protection seriously

We have reviewed and updated our policies, processes and procedures to comply with the General Data Protection Regulation (EU) 2016 / 679 (GDPR and DPA) and the Data Protection Act 2018 (DPA) and have updated this Privacy Notice accordingly.

June 2020 - Coronavirus Update: Additional data

As a result of the coronavirus pandemic, Richmond Rugby Club has implemented new and additional safety measures in accordance with government guidelines for the safety of players, player management and support staff including contractors and external suppliers.

The safety measures involve the collection and processing of additional sensitive data for all individuals prior to attending training sessions at the club for the foreseeable future.

This information is collected via Google forms, sent by email (the Form), on a regular basis and will be secured as outlined in this privacy notice and held for 6 months. Access to this data will be restricted to senior members of medical staff. The data will only be used for the specific purpose of ensuring the safety of public health and may be shared with a responsible public health authority if requested by them.

Our lawful basis for collecting and processing this information is that it is necessary for Richmond Rugby Club, as a data controller, for reasons of public interest in the area of public health and to protect vital interests of the individual. As such consent is not required from individuals and completion of the Form is mandatory.



Purpose for processing and lawful basis

Type of Data	Processing	Lawful basis
Contact details – name, address, email address, phone number, family members Emergency contact details	Player registration Team and player administration	Performance of contract Legitimate Interests
Email address	Club information newsletters, events, upcoming matches, member benefits	Legitimate Interests
Playing History including club/school/college details	Administration of teams Make decisions about development and training	Legitimate Interests
Ranking, ratings, playing details, game performance data, records of game and event attendance	Administration of teams, Make decisions about development and training Performance reviews	Legitimate Interests
Identification documents eg. Passport, proof of address	DBS checks, safeguarding of children RFU Registration process	Performance of contract (with RFU)
Immigration documents eg. Visas	Eligibility to play / work RFU Registration process	Performance of contract (with RFU)
RFU registration number / GMS ID number	Administration of players and support staff	Performance of Contract (with RFU)
Payroll details – bank account, NI number, HMRC data	Payment of players and support staff	Your consent
Credit Card details	Merchandise payments, tickets	Your consent
Contract details	Administration of players and support staff	Performance of Contract
Recruitment information	Administration of support staff	Legitimate Interests
Disciplinary and grievance information	Administration of grievance procedures	Legitimate Interests
Accreditations, qualifications and experience for coaching and medical staff	To safeguard players	Legal requirement from Governing body – RFU
Records of communications eg emails, phone calls	Communication / respond to queries and requests	Legitimate Interests
Video footage and photographic images from matches	Recording of matches for training, performance and other monitoring activities Promotional activities	Performance of Contract
Other video and voice recordings	Publicity for either the club or the player	Your consent
Email communications	Respond to queries, complaints, receipt of information	Legitimate Interests
Special categories of data – Child and Sensitive data		
Medical information, including injury information, in game assessments for all players including for Children	Safeguarding of players Provide and administer Insurance policies HIA research	Substantial public Interest (Schedule 1 Part 2 DPA 2018) Legitimate Interests



		Your consent / parental consent
Criminal convictions and offenses	DBS checks, safeguarding of children	Legal requirement
Race, ethnicity, sexual orientation	Equality of opportunity and treatment and to participate in rugby	Your consent / parental consent Legal requirement from governing body - RFU

Source of your data

We receive information about you from you when you: complete the player registration process; agree to work or volunteer for us as part of the playing support teams; play/train for/with any of the club teams; provide coaching; provide medical services and provide strength, conditioning and fitness assessments.

We may receive information about you from: other clubs, RFU or other companies with your consent. We do not receive or buy in lists of personal data from third party sources.

Recipients of your data

As joint Controllers with the RFU we are required to pass on any data requested by them based on RFCL's obligations as a club registered with the RFU. Their Privacy Notice/s sets out how they use this data here. The RFU has a role to ensure that RFCL comply with the regulations, codes, policies and processes of the governing body.

We are also required to use the RFU's Game Management System (GMS) and RugbySquad which are administered by the RFU.

As joint Controllers with medical organisations involved in your medical treatment and fitness to play, we are required to pass on your data for player safeguarding and appropriate medical treatments. We do not pass on your information to any other party unless required to by law for example: HMRC.

Third parties / sub processors

We use third party companies to perform certain services for us, such as IT support, Banks, Payment processors and Accountants. All third party processors are subject to a binding contractual obligation to process your personal data in accordance with our instructions and to comply with their responsibilities as Data Processors under GDPR and DPA.

Automated decision making

We do not undertake any automated decisions using your data.

Security of your data

We have taken all reasonable steps to ensure that we and our Data Processors adapt Industry standard security protection systems to ensure the security of your data. Where personal data is stored in locations other than the EEA we have assured ourselves that the Data Processor is aware of their responsibilities for the privacy and security of your data under GDPR and DPA.

Credit card details

For credit card transactions made by telephone, the payment card details are cross-shredded immediately. We only use PCI-DSS compliant payment systems procured from reliable third- party providers.

The credit/debit card information you provide for any transaction will be used by us solely to process that transaction.

We cannot accept credit/debit card payments by email and will decline to accept payment by that means.



Retention of your data

We only retain your data for as long as we are legally obliged to do so. This is typically 7 years after you cease to become a member where we have financial transactional data.

Your rights under GDPR and DPA

You are entitled to ask about the data that is held about you, subject to certain exceptions. This is called a Subject Access Request (SAR).

These should be made by email or in writing to the following address: dpo@richmondfc.co.uk

Address: Data Protection Officer, The Athletic Ground, Twickenham Road, Richmond, TW9 2SF

In addition, the GDPR and DPA provides the following rights for individuals - [click here](#)

- The right to be informed
- The right of access
- The right to rectification
- The right to erasure
- The right to restrict processing
- The right to data portability
- The right to object
- Rights in relation to automated decision making and profiling

If you would like to exercise any of your rights under GDPR and DPA, please email our Data Protection Officer at dpo@richmondfc.co.uk

You have the right to complain to the Information Commissioners Office (ICO) if you are not satisfied with our handling of your requests about the protection of your data. Follow the link [here](#) to report a concern to the ICO.

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