



## Data Protection Policy

### Introduction

In order to operate Buckhurst Hill Bowling and Lawn Tennis Club ("the Club") the Club needs to gather, store and use certain forms of information about members, suppliers, business contacts and other people the Club has a relationship with or regularly needs to contact.

This policy explains how this data should be collected, stored and used in order to meet the Club's data protection standards and comply with the law.

### Why is this policy important?

This policy ensures that the Club:

- Protects the rights of our members
- Complies with data protection law and follows good practice □ Protects the Club from the risks of a data breach.

### Who and what does this policy apply to?

This applies to all those handling data on behalf of the Club, and all data that the Club holds relating to individuals including:

- Committee members
- Members
- Employees
- Suppliers

### Roles and Responsibilities

Everyone who has access to data as part of the Club has a responsibility to ensure that they adhere to this policy. The Club has decided not to appoint a Data Protection Officer due to the relatively low volume of data that the Club holds relating to individuals and the limited amount of processing of that data.

### Data Protection Principles

#### 1. We fairly and lawfully process personal data

The Club will only collect data where lawful and where it is necessary for the legitimate purpose of the Club.

- a. Members' names and contact details will be collected when they first join the Club and will be used to contact the member regarding Club membership, administration and activities
- b. The name and contact details of committee members, employees and contractors will be collected when they take up a position and will be used to contact them regarding Club administration related to their role.

**2. We only collect and use personal data for specified and lawful purposes.**

- a. When collecting data, the Club will always explain to the subject why the data is required and for what it will be used.
- b. We will never use data for any purpose other than that stated or that can be considered reasonably to be related to it. For example, we will never pass on personal data to third parties without the explicit consent of the person.

**3. We ensure any data collected is relevant and not excessive**

The Club will not collect or store more data than the minimum information required for its intended purpose.

**4. We ensure data is accurate and up to date**

The Club will ask members and employees to check and update their data on an annual basis. Individuals will be able to update their data at any point by contacting the General Secretary.

**5. We ensure data is not kept longer than necessary**

The Club will keep data on individuals for no longer than 12 months after our involvement with the individual has stopped, unless there is a legal requirement to keep records.

**6. We process data in accordance with individuals' rights**

The following requests can be made in writing to the General Secretary:

- a. Members can request to see any data held on them. Any such request will be actioned within 14 days of the request being made.
- b. Members can request that any inaccurate data held on them is updated. Any such request will be actioned within 14 days of the request being made.
- c. Members can object to any use of their data that might cause them substantial distress or damage or any automated decisions made based on their data. Any such objection will be considered by the Committee and a decision communicated within 28 days of the request being made.

**7. We keep personal data secure**

The Club will ensure that data held electronically or physically by us is kept secure. Access to data will be given only to relevant Committee members when clearly necessary for the running of the Club.

**8. Member to Member Contact**

We only share members' data with other members with the subject's prior consent. To facilitate this, members can request the personal contact data of other members in writing via the General Secretary or Sectional Secretaries. These details will be given, as long as they are for the purpose of contacting the subject (for example, an email address, not financial or health data) and the subject consents to their data being shared with other members in this way.

## **9. Children**

The Club has a contract with a qualified tennis coach who is aware of what is required to meet the GDPR and item 8 of the ICO guidance in the “Twelve Steps” document.

The club maintains details of junior members and will ensure that the privacy notice is appropriately worded to be capable of understanding by children. Although the Club does not offer online services to junior members, the club obtains the consent of junior members, or the person holding parental responsibility if under the age of 16. These records are subject to the same strictures as those outlined elsewhere in this Policy document.

## **10. Cookies on the Club Websites**

Cookies are small text files which appear when a user browses a website. We do not:

- a. Use cookies to collect any personal identifiable information or collect any sensitive information without express permission.
- b. Pass data on to advertising networks or pass personally identifiable data to third parties. If the settings on a browser are adjusted to accept cookies we take this, and the continued use of the website, to mean that this is accepted. Cookies may be turned off by adjusting the browser.

**Next review date:** July 2026