

## **METROPOLITAN BUSHEY BOWLS CLUB**

### **DATA PROTECTION POLICY**

#### **1. BACKGROUND**

This policy has been drafted to ensure that the Club complies, where applicable, with the requirements of the General Data Protection Regulation (GDPR), effective from **25 May 2018**. The Regulation, which replaces the UK Data Protection Act (DPA), is a new, Europe-wide law and places greater obligations (than the DPA) on how organisations handle personal data.

#### **2. PRINCIPLES OF GDPR**

These are:

- **Lawfulness, fairness and transparency:** including consent; individuals are informed who is processing their data, and the purpose of processing
- **Purpose and limitation:** data processed only for the purpose for which it is collected
- **Data a minimisation:** only collect and process what is necessary
- **Accuracy:** ensuring that information about individuals is correct and up-to-date
- **Storage limitation:** only for a reasonable period
- **Confidentiality and integrity:** data secure at all times; club officials handling data to be aware of their responsibilities

#### **3. RIGHTS OF INDIVIDUALS UNDER GDPR**

All persons associated with an organisation (such as the Club) are entitled to:

- easily access their data
- have data rectified on request
- have their data removed
- restrict the processing of their data
- object to their data being used.

#### **4. THE LAW**

An organisation is permitted to collect and process personal data if

- it has the consent of the data subject
- it is in the legitimate interests of the data controller (eg. Club Secretary)
- it is necessary for the performance of the contract or agreement with the data subject, eg. need to send members details of meetings, events, etc, as part of their membership.

##### **a. Personal Data**

Defined as “any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier”. This definition provides for a wide range of personal identifiers to constitute personal data, including name, identification number, location data or online identifier, reflecting changes in technology and the way organisations collect information about people.

The GDPR applies to both automated personal data and to manual filing systems where personal data are accessible according to specific criteria. This could include chronologically ordered sets of manual records containing personal data.

Hence information gathered on membership application forms, such as names, dates of birth, addresses, telephone numbers and email addresses is designated as personal data. As indicated in section 2, such data must be processed lawfully, fairly and transparently.

##### **b. Processing Data**

This term includes “any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission”.

#### **5. COMPLIANCE ACTION BY THE CLUB**

##### **a. Members’ personal data**

A summary of the data collected, held and processed by the Club is as follows:

1. The Club currently collects, holds and processes the following personal data on registered members:

##### **Application form**

- Surname and first name(s)
- Address and Postcode
- Telephone number
- Mobile number
- Email address
- Previous bowling experience

Additional action by applicant in compliance with the new policy:

- Signature box tick, and date at foot of the Consent Form.
- The Club also retains data of those honoured with Honorary Life Membership

## Membership List

Maintained solely by the Secretary in paper and computerised format, with the following sections:

- Name
- Postal address
- Telephone numbers
- Email address

Contact details of members are shared with other Club members for the purposes of informing them of the Club's activities and allowing Club members to contact other members.

Contact details of members are shared where necessary with Executive Officers of Hertfordshire Bowls and Watford & District Bowling Associations.

## Finance-related data

The Treasurer records the names of members who have made payments to the Club eg. for annual subscriptions and other fees and where members are reimbursed for authorised expenses.

2. **Communication between members:** by post, telephone and (predominantly) email, as the majority have internet access. These communications often make reference to other members of the Club.

3. The Club's **website** includes

Photographs of matches and finals and of social events such as the Annual Presentation Lunch, in some cases identifying those in the photograph by name.

4. Personal data relating to **past members** is processed, except as agreed otherwise with the individual, as follows:

- **Resignations and non-renewals:** held by the Secretary and by the Treasurer, for necessary audit purposes for up to 12 months and then removed from the computerised databases maintained by Committee Officers.
- **Deaths** (if notified to the Secretary or another Committee Officer): removed as for resignations and non-renewals.

b. **Applications for membership**

The Club's application form has been amended to include the following additional section:

*The information you have provided on this form will be used by the Club for purposes only in connection with the running of the Club, which includes communicating by post, telephone and email. It will never be disclosed or sold to any third party. You have a right to complain to the Information Commissioner's Office if at any time you believe there is a problem with the Club's handling of your data. Please indicate below that you have read and accept these terms.*

*Signed..... Date.....*

c. **Current members**

The Secretary will write to all members with a summary on the GDPR and seek their co-operation in signing and returning the formal declaration of consent form.

## 6. EFFECTIVE DATE

The policy, as approved by the Club's General Committee, is effective from 1 December 2018.

## 7. REVIEW

The Club's General Committee will review this policy at least annually, and any agreed amendments will be notified to the members.

## 8. DISTRIBUTION

A copy of the policy is accessible to all members via the website and on display in the bowls hut.

Approved by the Club's General Committee  
29 November 2018