



## **WALTON-ON-THAMES CRICKET CLUB**

### **POLICY DOCUMENT 5.1**

#### **PRIVACY POLICY**

##### **INTRODUCTION**

Personal data is vital to allow the Walton-on-Thames Cricket Club to manage its relationships with all people involved with the Club. It is important to balance this with the need to respect the privacy of individuals and to keep their information safe.

Walton-on-Thames Cricket Club will inevitably process the personal data of its members including the President, Life Members, Vice Presidents, Senior playing members (both male and female), Junior Playing Members (both male and female), Social Members and other personnel involved with the Club. This means that the Club is obliged to meet the requirements of the General Data Protection Regulation 2018 (“GDPR”). GDPR increases the sanctions and fines that can be imposed for improper processing of personal data which, along with the reputational damage that the Club may suffer, is something that the Executive Committee is keen to avoid.

##### **KEY REQUIREMENTS**

Walton-on-Thames Cricket Club is required to abide by the key GDPR principles which require that personal data is:

- Processed fairly, lawfully and transparently.
- Collected for specified, explicit and legitimate purposes.
- Adequate, relevant and limited.
- Accurate and where necessary kept up to date.
- Retained for no longer than is necessary.
- Processed in a manner that ensures appropriate security of the personal data.



To this end the Club must have evidence that its systems and processes comply with GDPR.

The Club is responsible for and must be able to demonstrate compliance with all the above principles.

## **GENERAL**

The Club is reliant initially on receiving the data subject's consent to process their data. This will be an opt-in decision, obtained via signature on the membership application form. This form makes it absolutely clear what personal data is being collected, how it will be stored and used.

Subsequently when this data is shared with other authorised parties within the Club, because the subject has agreed to be appointed as an official of the Club, the Club will make the subject aware of the Club's Privacy Notice. The data subject will be given the option to opt out of the process to include their personal data on Club media – fixtures handbooks the Club website. The data subject will also be given the opportunity to change their mind at a later date.

Data security is an important consideration for the Walton-on-Thames Cricket Club's existing systems and processes.

The Club will appoint a Data Protection Officer to be responsible for ensuring that the Club meets its obligations under GDPR at all times. The Club will ensure that the personal data it holds is kept safe and up-to-date. Our policy will be to retain only that data that applies to current members (i.e. members who are fully subscribed). Data of persons who are no longer members for whatever reason is to be destroyed within one month of their membership ceasing.

## **RIGHTS OF INDIVIDUALS**

Walton-on-Thames Cricket Club understands that the rights given to individuals under GDPR are as follows:

- The right to be informed.
- The right to 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 automatic decision-making and profiling.

## **KNOW OUR CLUB**

To ensure that all our obligations are met, we must understand why we do what we do and the way we do it:

### **What Information Do We Collect and Why Do We need it?**

A new applicant for membership of Walton-on-Thames Cricket Club will be asked to provide their Name, Date of Birth, Postal Address, email address and telephone numbers,. This data must be freely given and the applicant is required to sign a statement on the application form to the effect that they give their consent for Walton-on-Thames Cricket Club to retain and process this data for Club purposes only.

This data will be stored on the Club's Membership database and processed by the Membership Secretary.

This information is required to

- identify the applicant,
- provide contact details for him/her, and
- to inform the wider Club about his/her skills.

### **What Information Do We Hold on Existing Members?**

We hold the same categories of information as those listed for new applicants. The data is stored on the same database and managed in exactly the same way.

### **What Must We Tell the Applicant, or the Volunteer for an Appointment?**

We must inform them that their full data will be shared with the Club's Executive Committee, Team Managers and Team Coaches in order to inform these individuals of the 'player profile' of the individual and to better enable their participation in our sports events.

We must also subsequently inform any member selected to an appointment within the



club or to be a Team Manager that the minimum data of name, email address and phone numbers will be published in the club website and in the Fixture Handbook.

Walton-on-Thames Cricket Club cannot operate without this information being made available to its members and opposition clubs and is therefore justified in publishing this data. If the individual does not wish his or her data to be published in this or any similar manner, he/she may 'opt out' by writing to the Secretary and their data will be erased as and where necessary. In certain circumstances this may preclude that individual from fulfilling the chosen appointment.

### **Where and How Do We Store the Data?**

Walton-on-Thames Cricket Club will store the personal data on the "SPOND" platform.

### **Do We Share This Data?**

Internally, the personal data will be shared with the the Club's Executive Committee, Team Managers and Team Coaches. This data is used for Club sports and sport administration purposes.

Externally the basic data of name, contact number and email address of a Team Manager manager will be shared with the authorized representative of a match opposition in order that contact and match communication can be achieved for the delivery of the said match.

Apart from these two circumstances, the personal information is not to be shared with any other third party outside the Club.

### **When is the Data Deleted?**

The personal data is to be deleted from the Membership database within one calendar month of the date that the individual ceases to be a member of the Club. Under no circumstances is the Club to maintain records of 'past members'.



## **RESPONSIBILITIES**

The Club is to appoint a Data Protection Officer to ensure that it complies with all of its obligations under GDPR.

The Data Protection Officer will be responsible for keeping the Club's Privacy Policies and Privacy Notices up-to-date, for maintaining records to demonstrate that the Walton-on-Thames Cricket Club is complying with GDPR and for ensuring that all necessary Club volunteers and appointees follow the regulations law and its processes.

Approved by the Committee

Signed (Secretary)

Name

Date