

West Wickham Bowling Club (CIO) Data Protection Policy



WWBC is committed to protecting its members personal data in accordance with the GDPR Act of 2018.

The club's Data Protection process relies upon the informed consent provided annually by members on their renewal forms. An application form for membership will have been initially submitted to the club containing Name, Address and Contact details. This original form will be stored as a manual record and the personal data transcribed to the membership database. This information is kept up to date by the member informing the club membership secretary of any changes. Members are asked each renewal to confirm that the details held are correct.

A data flow diagram is presented (see page 4) that shows the process of collecting personal data, how it is stored, which WWBC officers process this data and what for. Third parties with whom the data is shared are shown. They are committed to be fully GDPR compliant.

A detailed description of the management principles adopted by WWBC are identified in the section that follows. This next section outlines the lawful basis for collecting and using personal data and the steps taken to comply with data protection regulations.

This detail aims to provide a clear understanding to members of why their data is being collected, what it is being used for and by whom.

Members data is shared within the club, with officers and volunteers in fulfilling the operational activities of the bowls and social committees.

Every year a members handbook is produced that contains a list of officers and members with their contact details. The production of this handbook requires individual's details to be shared with a third party printer. These annual handbooks are supplied to each member of the club. Additionally copies of the handbook are provided to other outdoor bowling clubs with whom WWBC has an association or affiliation.

Members data is shared externally with Bowls associations where the member has opted to enter competitions run by such an organisation. Each association produce their own handbooks which contain details of individuals who have entered their competitions. These handbooks are distributed amongst their members and competition entrants. This data may appear on association websites. WWBC can not take responsibility for the accuracy and use of personal data passed on to these third parties. All these third parties have published data protection regimes and policies which are available directly from each organisation.

The GDPR gives individuals a number of rights in relation to any personal data an organisation holds about them and it is WWBC's policy to make it as easy as possible for people to exercise these rights. Under GDPR all individuals are entitled to be told what personal data an organisation holds about them, and to receive copies of that information, free of charge, within one month of that individual making a formal application.

Members can make an application by contacting the club's General Secretary by email or letter. If a member believes WWBC is holding inaccurate information about them then they should contact the club's **General Secretary** to request this be rectified. In addition, if it is believed that WWBC no longer has a lawful basis to use a member's personal data, that member can request WWBC to delete it. The right to rectification and erasure is not absolute but WWBC will consider each request carefully and comply where appropriate. A member can withdraw their consent for the club to use their personal data at anytime; such a request will be complied with promptly.

For a legal guide to GDPR for sports clubs refer to: www.wrighthassall.co.uk/knowledge-base/guide-to-the-gdpr-for-sports-clubs

I. Lawful basis

- A. Personal data shall be processed fairly and lawfully, in accordance with the rights of data subjects under the Data Protection Act 1998
- B. Personal data shall be obtained for fulfilling legal requirements and to meet WWBC operational needs
- C. These needs include the obligation to keep members informed of social and playing activities; managing participation and performance in such activities. Data will not be used in any manner incompatible with these stated purposes
- D. Data minimisation: only that data that is necessary in relation to the functions of managing the club are collected and processed
- E. Explicit consent is obtained annually from members to hold data for the declared purposes
- F. Personal data will be held accurately and kept up to date and not retained for longer than necessary

II. DPO appointment exemption

- A. Yes. The Information Commission's Office (ICO) has been consulted - there is no requirement for a Data Processing Officer
- B. The club is a non profit organisation and qualifies for exemption
- C. The club does not use CCTV for crime prevention purposes
- D. The club only holds member's data for the purposes of running the club

III. GDPR working party established

- A. General Secretary and Club Treasurer
- B. Data controller deemed to be WWBC Management Committee (MC)
- C. This committee will determine the purpose and means for processing personal data
- D. Data Processors identified according to role and activity within the club
- E. The main "processors" will be the General Secretary and Club Treasurer - plus membership, bowls & social committee secretaries
- F. The General secretary is the designated officer responsible for data protection compliance and the point of contact for data protection issues

IV. Process established to review regularly

- A. Annual review diarised & performed in last quarter prior to renewal cycle beginning (October-November)
- B. Members of the main committee and sub committees receive awareness briefing of GDPR annually prior to the start of the season (March)

V. Management authority

- A. The club is a charitable incorporated organisation (CIO) headed by a board of trustees (BoT).
- B. The BoT delegate day to day management authority to the MC who in turn delegate tasks to established sub committees.
- C. Personal data of officers and volunteers is made available to club members. Additionally from time to time officers will order goods or enter contracts with third parties on behalf of the club, providing their personal details.

VI. The use WWBC makes of member's personal data

- A. Membership applications; Membership renewal; Playing and social activities; Management of individual member's payments and refunds
- B. Members details relating to complaints, grievances, awards, appointments and other club business will be recorded in the club's minutes
- C. Data mapping process carried out and documented to understand personal data flows within and from WWBC
- D. The data mapping identifies what roles within WWBC capture and/or processes personal data
- E. Membership personal data is reviewed and updated through the renewal cycle (November to February)
- F. Membership consent is requested and provided via the annual issuance and return of the membership renewal form
- G. Lapsed member's data is deleted following two renewal offer cycles e.g Membership lapsed end of 2020 - record deleted May 2022
- H. Personal data is held within the U.K and shall not be transferred to any third party outside of the U.K.

VII. Storage & processing of member's personal data for renewal

- A. Following consent from a member, their personal details are stored on a password protected membership database held within a third party managed "cloud" operated by "Bespoke4business Marketing Limited" (U.K. Company number 07859038) - who operate to prevailing GDPR standards. Access to this system is limited to authorised club officers and selected members only
- B. The custodians of the membership database are the General & Membership Secretaries - who manage and limit access and functionality
- C. To complete membership renewal, access to the membership database is provided to the Club's Treasurer (CT) to form a financial database
- D. Membership data is exchanged between the custodians throughout the membership renewal cycle. Only statistics are passed to the MC.
- E. Membership data is used to compile a list of all current members & their contact details
- F. This membership list is sent to a printers to create the membership handbook
- G. A list of members and their phone contact details are displayed on the club's notice board which is visible by all members and visitors.

VIII. Storage of data

- A. The membership and financial databases are held on "cloud based" systems - which are regularly backed up by the system providers.
- B. The financial data base is XERO a proprietary application, access is restricted to those on the bank mandate and password protected plus the WWBC accountants have access to cash journals for audit purposes.
- C. Information will only be shared with declared recipients including external accountants, for the purposes of managing the clubs affairs.
- D. Such sharing will be in accordance with the declared lawful basis and in line with the members consent.

IX. Seasonal processing of member's personal data for operational purposes

- A. The custodians provides to the respective Bowls Committees and Social committee a list of all current members and volunteers
- B. The bowls and social committees use the members personal data throughout the season for the purposes of managing and playing bowls
- C. Secretaries and selectors of respective committees hold relevant personal data in electronic and paper form to enable the club to function
- D. When data is held electronically this will be on the "officers/volunteers" personal electronic device for the sole purpose of playing bowls.
- E. Officers will hold information securely. And will only share such information with other officers for the purposes of managing the club's affairs.

X. Non member personal data

- A. Non member personal data is recorded temporarily (on paper) for the purpose of a bowling or social activity
- B. Such data is discarded within 10 days and does not form part of the club's electronic records
- C. The exception being to adhere to COVID track and trace regulations where data is held for 21 days (legal obligation)

XI. COVID requirements - when applicable

- A. WWBC records visitor personal contact data as a legal requirement for NHS COVID-19 track & trace
- B. Members and non members are forewarned of the need for this data and its purpose
- C. Such data is recorded electronically to enable a log of visitors to be presented to NHS if required
- D. Non member data (recorded solely for the purposes of COVID) is deleted after 21 days of capture

XII. WWBC website "members only" section

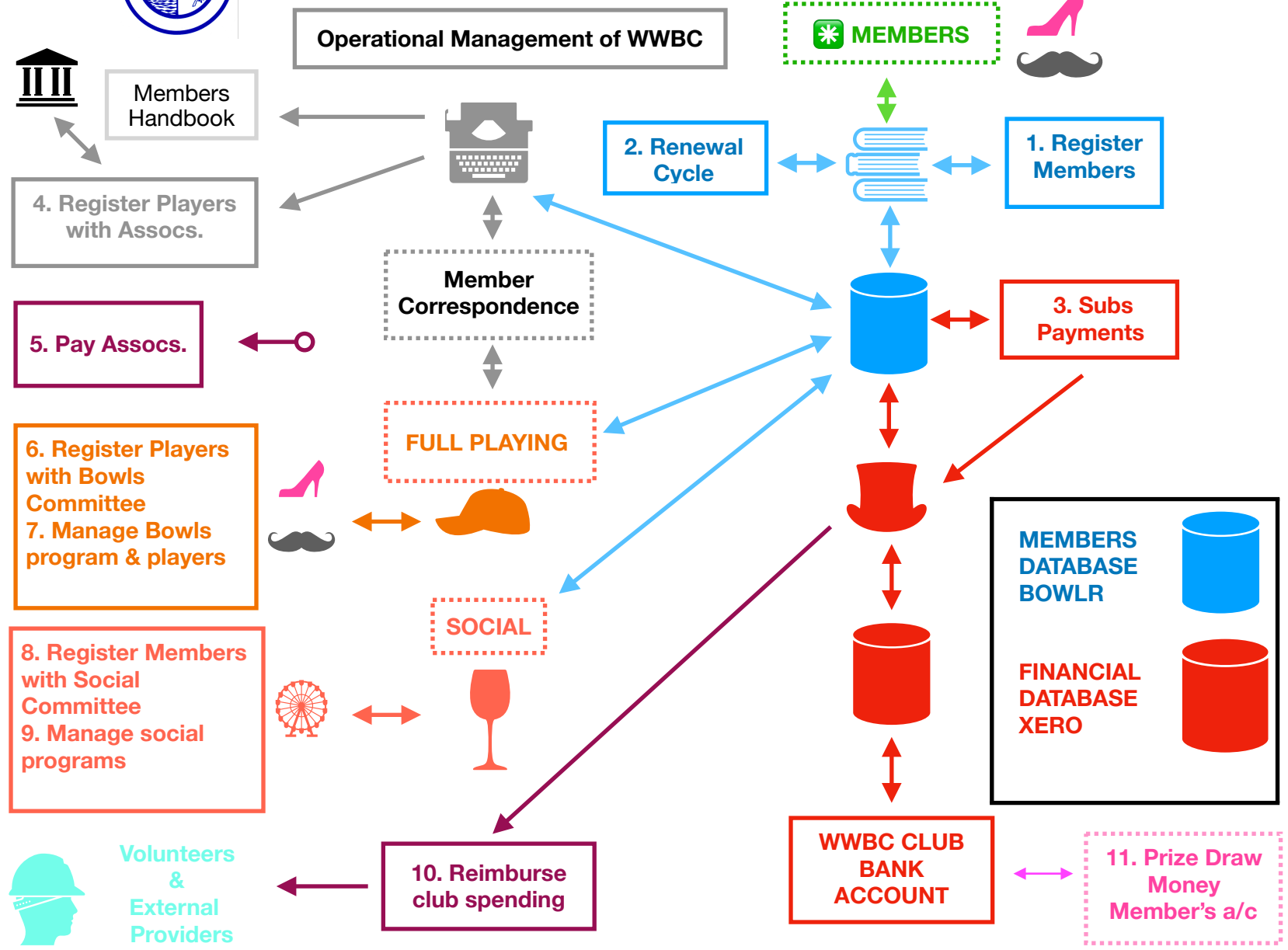
- A. The website has a section that only members can access by using a club password
- B. This "members only" area is managed by the club's webmaster
- C. Member's personal contact details are contained within the "members only" area and visible by members alone.
- D. WWBC GDPR privacy notice is posted within this "members only" section of the website.
- E. The process for an individual to exercise their rights regarding data protection queries is outlined on this website



U.K. GDPR: WWBC MEMBERSHIP DATA FLOW

Club roles processing members data

- Members**
- Custodians**
- Treasurer**
- General & Bowls Secretaries**
- Bowls Com'tees**
- Social Com'tees**
- External Bowls Clubs & Assocs.**



Note: No personal data is retained by the club when the contactless terminal is used for bar payments