

# Epsom Park Bowling Club

## General Data Protection Regulation (GDPR) Privacy Notice - June 2018

As required by the above regulation, this notice summarises the personal information held by Epsom Park Bowling Club Ltd (EPBC), the 'Data Controller', the uses to which it may be put and with whom it may be shared.

There are a number of legal justifications ('Lawful Bases') defined by GDPR, which apply to the club's data activities as follows:

- There are two Lawful Bases for the collection, recording and processing of personal information submitted with membership applications and renewals:
  - The first is the implicit entry into, and performance of a contract between members and the club, the former agreeing to pay the fees due to, and comply with the rules of the club in return for the benefits of membership.
  - The second being the pursuit of the legitimate interests of the club as a membership organisation (communication, administration, etc).
- The Lawful Basis for the disclosure (sharing) of the information defined below is through the consent of members, given through their completion of a permissions (disclosure) form at the time of joining or renewing membership.
- For data relating to financial or taxation matters, the basis is compliance with legal obligations

The following personal information may be held by the club: (none is defined as 'sensitive' by GDPR)

- Name
- Postal Address
- Tel. number(s) &/or email address
- Gender
- Date of Birth
- Fee payment details
- Donation and gift aid records
- Next of kin contact details (optional)
- Disclosure Permissions
- Content of communications from members
- Competition and league entries & results

The information is solely provided by members or prospective members by means of:

- Application forms
- Annual renewal forms
- Competition entry forms or team sheets
- Details given at 'taster' sessions, etc.
- Gift Aid declaration forms and individual donations to the treasurer, where applicable
- Updates received from individual members
- Other communications from members

The information is held by:

- The membership secretary (who has overall responsibility for data protection matters)
- Club officers and directors, with the exception of fee payment records held by the membership secretary and treasurer only, and donation records which are also kept by the club secretary.

How members' personal information is used

- Personal details are collected and collated by the membership secretary and made available to club officers for purposes of club administration.
- Members' disclosure permissions will be recorded and used to ensure any information disseminated is in accordance with members' wishes
- Consistent with permissions given, members' names, telephone numbers and e-mail addresses will be included in the club membership lists circulated electronically to all members and posted in the clubhouse for the purpose of arranging competitions, matches and other club events.
- Members will receive renewal notices, notices and minutes of general meetings, club news and other relevant communications by e-mail unless an e-mail address has not been provided or hard copies are specifically requested.

- Postal addresses will not be released by club officers to members. Members seeking this information must contact the individual by phone or e-mail.
- Members' names, and subject to permissions given, e-mail addresses, are submitted periodically to the Surrey Bowling Associations and other official bowls organisations, as an affiliation requirement and to allow direct communication of bowling news, etc.
- Details of donations where 'gift aid' is reclaimed, including donors' names & addresses, are provided to HMRC as required
- Personal details will not be released to 3<sup>rd</sup> parties for commercial or other purposes without members' explicit permission
- Personal details and images will only be posted to social media or other online sites with the explicit permission of members
- The name, address and telephone number of members entering external competitions will be supplied to the organising body where this is an essential requirement for entry.

#### Storage & retention of personal details:

- Master files of personal details are held as password protected spreadsheets by the membership secretary and forwarded periodically to the officers of the club. Hardcopies may also be held.
- Contact details (name and telephone and/or email address only) derived from above are provided to all members electronically or, by exception, as hard copies. Recipients are therefore required to maintain the confidentiality of these files, to keep them securely, and to delete / destroy out of date versions. Hard copies, displayed in the clubrooms, are secured by pin controlled entrance doors and will be kept current.
- On leaving the club or, in the case of club officers, on ceasing to hold office, recipients must delete all such files and destroy hard copies thereof.
- Records will be deleted / destroyed and distribution lists updated within 2 months of a member leaving the club with the exception of:
  - Instances where a 'deferral' is agreed on health or other personal grounds (1 year)
  - Records of payment of fees, Gift Aid declarations and donation records (including members name & address) for HMRC purposes (7 years)
- Permission Forms, to address any potential issue arising in the ensuing period (1 year)
- Records held will be reviewed annually at completion of the renewal cycle to ensure they are current.
- The names of past senior officers, competition and award winners on clubroom honours boards and on the club website will generally remain in perpetuity.
- A reminder to delete preceding versions will accompany the distribution of updates.

#### Members have the right:

- to request changes to, or the withdrawal of permissions previously given\*
- to receive a copy of their personal details held by the club \*
- to the correction or deletion of their personal details if inaccurate or inappropriate \*
- to erasure, i.e. 'to be forgotten' by deletion of personal details when no longer required for legal purposes or the legitimate administration of the club. An exception to this principle is the display in perpetuity of competition and award winners, together with past senior officers, on clubroom honours boards.
- to lodge a complaint with the Information Commissioner's Office if dissatisfied with the response to items above (visit the ICO website [www.ico.org.uk](http://www.ico.org.uk) for more information)

\* by contacting the club membership secretary in writing.