

Crofton Bowling Club

General Data Protection Regulations (GDPR)



Data Privacy Notice to Members

Crofton Bowling Club ('the Club') is committed to respecting your privacy. This notice explains how the Club may use personal information we collect about you before, during and after your Membership. This notice applies to you if you have registered to become, or are, a Member of the Club. This notice explains how we comply with the law on data protection, what your rights are and advises that, for the purposes of Data Protection, the Executive Committee of the Club is the designated 'Controller' of your personal information that we hold.

The term 'Member' in this notice includes all Membership categories, including regular, temporary, and 'Friends of Crofton'.

The Club is committed to ensuring compliance with the General Data Protection Regulations' principles:

- Meet the Club's legal obligations under the General Data Protection Regulations.
- Ensure that data is collected and used fairly and lawfully.
- Process personal data only in order to meet its operational needs
- Take steps to ensure that personal data is current and accurate.
- Establish appropriate retention periods for personal data.
- Provide Members with access to their personal information upon request.
- Respect Article 17 granting a Member the right to have their personal information erased.
- Provide adequate security measures to protect personal data.
- Ensure its relevant officers' computer security software is current.
- Ensure its relevant officers' computers containing personal information have that information password-protected and that the password is changed on a regular basis.
- Ensure that a nominated Committee Member is responsible for advising the Committee on its responsibilities for data protection compliance and acting as a point of contact for all data protection issues.
- Ensure that all Members are made aware of good practice in data protection.
- Provide adequate training for all Members responsible for personal data.
- Ensure that queries about data protection, internal and external to the Club, are dealt with effectively and promptly.
- Regularly review data protection procedures and guidelines within the Club
- Ensure that everyone handling personal data knows how/where to find further guidance.

Basis for Processing Data

The legal basis on which we process most personal data is that the processing is necessary for the legitimate interest reasons of the Club. These include compiling, maintaining and administering from a list of Members, communicating with Members as players, participants in competitions, advising dates of events and upcoming fixtures, access to club facilities, Membership meetings and social events.

If you do not provide us with the requested personal information we may not be able to admit you as a Member or we may not be able to properly execute our obligations to you or comply with legal obligations and we may correspondingly have to deny or terminate your membership.

Members' bank account information, and images which identify an individual Member, are each processed on the legal basis of 'consent'.

Data Protection

Personal Data is any data which may be used to identify, contact or locate a single person.

Data is held and processed as follows:

- The Club Assistant Secretary is responsible for holding for each Member their name, address, phone number(s), and email address. This data is also accessed, held and used by the Club Secretary for communications to Members, and by the Club Webmaster for website updating.
- Most of this information (but excluding address) is also made available, suitably access-protected, in the Clubhouse and on the Club's website, to all Club Members to enable contact between Members for competitions hosting, arranging matches, selection of teams, etc.
- Any Club Officials involved with Junior Players also hold such detailed information as is required under Safeguarding Legislation and supplied by a parent/guardian.
- The Club Assistant Secretary also holds Members' personal information from completed Club Membership Application forms. In addition to the name, address, phone number(s) and e-mail address, this may also include age and date of birth, and bowling history (as player and/or official).
- The Club Assistant Secretary and the Club's Coaches may also hold for any Temporary Member (pending completion of their Coaching Introduction sessions), and, for any 'Come and Try Day' attender, their name, address, phone number(s), and e-mail address.

Bank Account Information

The Club Treasurer or other Club Official may temporarily hold cheques, showing bank account details, submitted by a Member for the duration of the deposit process. Consent for this is implicit in the submission of the cheque to the Club. Any EFT¹ payment from the Club to a Member requires that Member's consent for the Club temporarily to receive and use the Member's bank account information for the duration of the payment process, after which the account details held by the Club will be deleted/destroyed. The information is shared with the Club's banking provider.

Photographic and Videographic Images

The Club, via any of its Officials, may hold photographic/video images of Members, typically taken at Club events or ceremonies, and may display these in the Clubhouse and/or on the Club's website, sometimes with the names of the subject individual Members. Permission to display will be requested of any Member to be identified in such images, prior to display; the Member may opt not to agree, in which case the Member's identifying image will not be displayed and will be deleted/destroyed.

¹ EFT: Electronic Funds Transfer

Personal Data of Selected Club Officials

The name, role, phone number(s) and e-mail address of selected Club Officials is also openly available on our website for the purpose of enabling external persons to make contact with the appropriate Club Official on matters of Club business, whether playing or administrative, and a subset of this data is also published in the hard-copy Members' annual Fixtures Booklet distributed to all regular Members & 'Friends'. This is in line with similar publication practices via the handbooks/websites of our affiliated Bowling Associations or organisations.

Any of the above information, or any subset of it, may be held:

- on the personal computer(s) with current security software, or on similar 'smart' devices with suitable security enabled, of Club Officials under password-based or similar protection.
- on the Club's official website, under password-protection to ensure access only by Members.
- by the Club's banking provider (banking information only)
- as security-protected hard-copy in the Clubhouse official record store
- as hard-copy, suitably secured, by appropriate Club Officials

Data Sharing

Personal information shared amongst Club Members, including Club Officials, is the contact information allowing communication on general club matters, and participation in competitions, matches, etc.

Personal information may be shared with other Bowling Associations or organisations to which the Club is affiliated where it is needed by those Associations or organisations to allow them to properly administer the sport on a local, regional and national level. Personal information once passed in this way is subject to Data Protection by the receiving Association or organisation.

Personal information may be deemed 'shared' with our website-hosting platform provider, in that a document listing such contact information is held on our website, albeit password-protected for Club Members' use only and its content is not visible to the website-hosting provider's organisation or externally. Photographic/videographic images of club members may also appear on our website.

For those who access, or may additionally subscribe to the 'e-mail alert' notifications service from, our website, such use and GDPR compliance is governed by a specific '[Website Privacy and Use' Policy](#), accessible from each website page.

Some personal (bank account) information may be shared with the Club's bank, for payment purposes.

Members' personal information controlled by the Club is not otherwise shared with external organisations, nor is it sold for marketing purposes.

Data Access and Erasure

Anyone who has their personal data held by the Club has the right to access, view and erase this data.

A subject Access Request (Article 15) grants each such person the right to a copy of all their personal data held by the Club. On receipt of such a request, the Club will provide this information in an electronically transportable format usable by the requester (unless otherwise specified) in a reasonable timeframe. The 'Right to be Forgotten' (Article 17) generally entitles individuals to have this data erased.

Data Breaches

In the event of a data breach posing any kind of threat to members' personal information, the Club will inform the affected individuals within 72 hours of such breach becoming known to the Club.

Changes to this Notice

We may update this privacy notice from time to time. If we change this notice in a material way, we will update the version date at the bottom of this page. For significant changes to this notice we will try to give you reasonable notice unless we are prevented from doing so. Where required by law we will seek your consent to changes in the way we use your personal information.

Contacting Us

All communications by Members to the Club on this subject, or other subjects, should continue to be addressed to the Club's Executive Committee, via the Club Secretary.

This Notice is owned and published by the Executive Committee, as the 'Data Controller' (as defined in GDPR) of Crofton Bowling Club.

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