

SIDMOUTH BADMINTON CLUB DATA PROTECTION POLICY

1. Introduction

- 1.1 Sidmouth Badminton Club ("**we**", "**our**" and "**us**") is a Club for the sport of badminton in Sidmouth. In order to provide our services as a member organisation, we are required to collect, process, use and retain certain personal data for a variety of purposes.
- 1.2 The majority of the personal data we process relates to our members.
- 1.3 This data protection policy ("**Policy**") applies to all of our officers and members whose work involves processing personal data, and other individuals working on our behalf who have access to the data. You must read, understand and comply with this Policy when processing personal data on our behalf. You must protect the data you handle in accordance with this Policy and any applicable data security procedures at all times.
- 1.4 This Policy sets out what we expect from you in order for us to comply with applicable Data Protection Laws (as defined below). Your compliance with this Policy and all related policies and guidelines is mandatory. Any breach of this Policy may result in disciplinary action.

2. About the Policy

- 2.1 This Policy describes how personal data must be collected, handled and stored to meet the company's data protection standards and to comply with all applicable laws and regulations relating to processing of personal data and privacy, including without limitation the General Data Protection Regulation ("**GDPR**") and any other data protection legislation in force from time to time (as applicable) and including where applicable the guidance and codes of practice issued by the Information Commissioner or any other relevant regulator ("**Data Protection Laws**").
- 2.2 This Policy and any other documents referred to in it sets out the basis on which we will process any personal data we collect from data subjects, or that is provided to us by data subjects or other sources.
- 2.3 This Policy may be amended at any time.
- 2.4 The Data Protection Officer is responsible for ensuring compliance with applicable Data Protection Laws and with this Policy. Any questions about the operation of this Policy or any concerns that the Policy has not been followed should be referred in the first instance to The Data Protection Officer, info@sidmouthbadminton.co.uk

3. Definitions of Data Protection Terms

"**data breach**" or "**breach**" means a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data transmitted, stored or otherwise processed.

"**data subjects**" for the purpose of this Policy means all living individuals about whom Sidmouth Badminton Club holds personal data. A data subject need not be a UK national or resident. All data subjects have legal rights in relation to their personal data.

"**personal data**" means any information relating to an identified or identifiable natural person; an identifiable person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number (NI number), location data, online identifier (IP address) or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that person.

"**processing**" means any operation or set of operations performed upon personal data or 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, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

"the consent of the data subject" means any freely given, specific, informed and unambiguous indication of his or her wishes by which the data subject, either by a statement or by a clear affirmative action, signifies agreement to personal data relating to them being processed.

4. Scope and Objectives of Policy

- 4.1 The Policy applies to personal data in all its forms whether on paper or stored electronically. It applies throughout the lifecycle of the information from creation through storage and utilisation to disposal. Appropriate protection is required for all forms of information to ensure business continuity and to avoid breaches of applicable Data Protection Laws or our contractual obligations.
- 4.2 With regard to electronic systems, the Policy applies to use of Sidmouth Badminton Club equipment and privately owned systems when connected to our network.
- 4.3 The Policy will ensure that Sidmouth Badminton Club:
 - 4.3.1 Complies with applicable Data Protection Laws and follows good practice;
 - 4.3.2 Protects the rights of its members,
 - 4.3.3 Is transparent about how it stores and processes personal data; and
 - 4.3.4 Protects itself from the risks of a data breach or other unlawful processing of personal data.

5. Data Protection Laws

- 5.1 The Data Protection Laws describe how we must collect, handle and store personal data and these rules apply regardless of whether data is stored electronically or in paper format.
- 5.2 Anyone processing personal data must comply with the enforceable principles of good practice. These include, but are not limited to, that personal data must:
 - 5.2.1 Be processed fairly and lawfully (lawfulness, fairness and transparency);
 - 5.2.2 Be collected only for specific and lawful purposes and not processed in a manner that is incompatible with those purposes (purpose limitation);
 - 5.2.3 Be adequate, relevant and limited to what is necessary for the purposes it is collected (data minimisation);
 - 5.2.4 Be accurate and kept up to date (accuracy);
 - 5.2.5 Not be held for longer than is necessary for the purposes it is collected (storage limitation);
 - 5.2.6 Be processed in accordance with the data subject's rights;
 - 5.2.7 Be processed in a manner that ensures appropriate security (integrity and confidentiality); and
- 5.3 Where we process personal data we are responsible for demonstrating compliance (accountability) with the principles set out in section 5.2 above.

6. Responsibilities

- 6.1 Whilst the Data Protection Officer is ultimately responsible for ensuring that Sidmouth Badminton Club meets its legal obligations under applicable Data Protection Laws, you are responsible for compliance with applicable Data Protection Laws.

7. Fair and Lawful Processing

- 7.1 Data Protection Laws are not intended to prevent the processing of personal data, but to ensure that it is done fairly and without adversely affecting the rights of the data subject.
- 7.2 For personal data to be processed lawfully, they must be processed on the basis of one of the legal grounds set out under applicable Data Protection Laws. These include, among other things, the data subject's consent to the processing, or that the processing is necessary for the performance of a contract with the data subject, for the compliance with a legal obligation to which the data controller is subject, or for

- the legitimate interest of the data controller or the party to whom the data is disclosed.
- 7.3 Our privacy notices explain the legal basis on which we process personal data; these are available on request. A version of our privacy notice is available on our website.
- 8. Processing for Limited Purposes**
- 8.1 We will only process personal data for specified, explicit and legitimate purposes, or for any other purposes specifically permitted by applicable Data Protection Laws. We will not undertake further processing in any manner incompatible with those purposes, and will not use it for new, different or incompatible purposes from that disclosed when it was first obtained, unless you have informed the data subject of the new purposes, and they have consented (if necessary).
- 8.2 We will notify those purposes to the data subject when we first collect the data or as soon as possible thereafter, and such purposes may include (amongst others):
- 8.2.1 Providing our services to our members,
- 8.2.2 Compliance with our legal, regulatory and corporate governance obligations and good practice;
- 9. Providing information**
- 9.1 If we collect personal data directly from data subjects, we shall ensure that data subjects are aware that their data is being processed, and that they understand the purposes and lawful basis for which it is processed, the legitimate interests of Sidmouth Badminton Club any recipients or transfers of their data, the retention periods for their data and the existence of each of their rights in respect of such data.
- 9.2 To assist with our compliance of the above requirements, we have privacy statements setting out how we use personal data relating to data subjects (see section 7.3 above).
- 10. Adequate, Relevant and Non-Excessive Processing**
- We will only collect personal data to the extent that it is required for the specific purpose notified to the data subject. As such, we will not process personal data obtained for one purpose for any unconnected purpose unless the data subject concerned has agreed to this or would otherwise reasonably expect this.
- 11. Data Accuracy**
- 11.1 If we receive a request to update or correct any personal data we hold, and provided we have authenticated the identity of the data subject in question, we will take all reasonable steps to ensure that personal data we hold is accurate and kept up to date. We will take all reasonable steps to destroy or amend inaccurate or out-of-date data.
- 11.2 You must take reasonable steps to ensure that personal data is kept as accurate and up to date as possible and personal data should be updated as inaccuracies are discovered. For example, if an e-mail address is no longer in service, it should be removed from the database.
- 11.3 Data subjects may ask that we correct inaccurate personal data relating to them. If you believe that information is inaccurate you should record the fact that the accuracy of the information is disputed and inform the Data Protection Officer promptly.
- 12. Processing in line with Data Subject's Rights**
- 12.1 We will process all personal data in line with data subjects' rights to and in connection with their personal data in accordance with the Data Protection Laws.
- 12.2 If a data subject makes a request (written or otherwise) to exercise any right (or purported right) in respect of their personal data, you should **immediately** forward it to the Data Protection Officer.
- 12.3 The Data Protection Officer will handle the response to the request and ensure that the identity of anyone making a request has been adequately verified before handing over any information.

- 12.4 Any complaints received from a data subject should be escalated to the Data Protection Officer **immediately**.
- 13. Data Retention**
We will not keep personal data longer than is necessary for the purpose or purposes for which they were collected, and all personal data will be held in accordance with our data retention policy.
- 14. Data Security**
14.1 We will take appropriate security measures against unlawful or unauthorised processing of personal data, and against the accidental loss of, or damage to, personal data. We have put in place procedures and technologies appropriate to our size, scope and business, our available resources and the amount of personal data that we process. These measures will maintain the security of all personal data from the point of collection to the point of destruction. We will regularly evaluate and test the effectiveness of these measures to ensure security of our processing of personal data in accordance with our IT Policy.
- 14.2 We will maintain data security by protecting the confidentiality, integrity and availability of the personal data, defined as follows:
- 14.2.1 **Confidentiality** means that only people who are authorised to use the data can access it.
- 14.2.2 **Integrity** means that personal data should be accurate and suitable for the purpose for which it is processed.
- 14.2.3 **Availability** means that authorised users should be able to access the data if they need it for authorised purposes.
- 14.3 It is your responsibility to ensure that you keep personal data secure against loss or misuse in accordance with this Policy.
- 15. Sharing personal data**
15.1 If we share personal data with third parties, we will do so in line with applicable Data Protection Laws. We may have to share personal data with government bodies, such as HMRC.
- 15.2 You may only share the personal data we hold with third parties if:
- 15.2.1 sharing the personal data complies with the privacy notice provided to the data subject, and, if required, the data subject's consent has been obtained;
- 15.2.2 the transfer complies with any applicable cross-border transfer restrictions.
- 16. Data Storage**
16.1 Personal data should be stored only electronically whenever possible and the recording of personal data in paper format should be kept to a minimum. In exceptional circumstances where personal data is recorded in paper format, it should be kept in a secure place to prevent unauthorised access to such personal data by unauthorised personnel.
- 16.2 When you store personal data, whether electronically or in paper form, you must protect it in accordance with our IT Policy.
- 17. Data Breaches**
You must comply with Sidmouth Badminton Club's Data Breach Policy.
- 18. Disclosing data for other reasons**
In certain circumstances, the applicable Data Protection Laws allow personal data to be disclosed to law enforcement agencies without the consent of the data subject. Under these circumstances Sidmouth Badminton Club will disclose requested data. However the Data Protection Officer will check that the request is legitimate seeking assistance from the company's legal advisers where necessary.
- 19. Policy Awareness**
19.1 You are obliged to comply with this Policy when processing personal data on behalf of us. Any breach of this Policy may result in disciplinary action.

20. Changes to this Policy

We reserve the right to change this Policy at any time. Where appropriate, we will notify you of those changes by mail or email.

21. Questions

Please refer questions to the Data Protection Officer –
info@sidmouthbadminton.co.uk