



2.4a DATA PROTECTION – KEY POINTS

Note: The Club's full data protection policy is contained in club document **2.4 Data Protection Policy** and this aide-memoire should be read in conjunction with that document.

Managing Data Protection

- All members of the Club have a responsibility for protecting personal data, especially Club officers, coaches, team captains and managers.
- The Data Protection Working Group is responsible for overseeing the management of data and its protection. The members of the working group are:
 - Club Chairman - policy.
 - Club Secretary - information requests, complaints and data breaches.
 - Membership Secretary - accuracy of data and access to data.
 - Welfare Officer.

Database

- The Club uses an electronic database designed in part for processing members personal data.
 - The database is run by FullOnSport Ltd, under an agreement with the Club.
- The Club also stores and processes other personal data about its members.

Definitions

- Personal data in this instance is defined as information that:
 - Relates to a living individual who can be identified from the data.
 - Is specifically about the individual.
 - Relates to property of that individual.
 - It could be processed to learn, record or decide something about the individual.
 - Is biographical in a significant sense.
 - Has the individual as its focus.
 - Affects the individual's privacy.
 - Is an expression of opinion about the individual.
 - Is an indication of the Club's intentions towards the individual.

- Processing, in relation to personal data, means obtaining, recording or holding the information or data, or carrying out any set of operations on the information or data, including:
 - Organisation, adaptation or alteration of the information or data.
 - Retrieval, consultation or use of the information or data.
 - Disclosure of the information or data by transmission, dissemination or otherwise making available.
 - Erasure or destruction of the information or data.
- Data Subject means an individual who is the subject of personal data.
 - All registered members of the Club are Data Subjects, as well as potentially anyone else who corresponds or inter-acts with the Club and its members.
 - Consent of the Data Subject is defined as any freely given specific and informed indication of their wishes by which the Data Subject signifies their agreement to personal data relating to them being processed.
- Data Controller means a person (or organisation) who determines the purposes for which and the manner in which any personal data are, or are to be, processed.
 - The Club is the Data Controller.
- Data Processor means any person who processes the data on behalf of the Data Controller.
 - FullOnSport is a Data Processor.

Data Protection Principles

- Under the terms of the Data Protection Laws the following principles must be applied:
 - Personal data shall be processed fairly and lawfully and, in particular, shall not be processed unless the data subject has given their consent to the processing.
 - Personal data shall be obtained only for one or more specified and lawful purposes, and shall not be further processed in any manner incompatible with that purpose or those purposes.
 - Personal data shall be adequate, relevant and not excessive in relation to the purpose or purposes for which they are processed.
 - Personal data shall be accurate and, where necessary, kept up to date.
 - Personal data processed for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.
 - Personal data shall be processed in accordance with the rights of data subjects under the Data Protection Laws.

- Appropriate technical and organisational measures shall be taken against unauthorised or unlawful processing of personal data and against accidental loss or destruction of, or damage to, personal data.
- Personal data shall not be transferred to a country or territory outside the European Economic Area, unless that country or territory ensures an adequate level of protection.

Purpose

- The purpose for which the data is intended to be processed is to maintain personal contact details and other information about individual members of the Club to enable the proper conduct, operation and function of the Club.
- Personal data shall be obtained solely for the purpose of enabling the proper conduct, operation and function of the Club.
- Personal data shall be the minimum required for the purpose of enabling the proper conduct, operation and function of the Club.
- The personal data shall be verified as accurate by the Data Subject, and will be kept up-to-date by the Club Membership Secretary and/or the Data Subject.
- The personal data for a Data Subject shall be kept only whilst that individual is a member of the Club: Should a member leave the Club data may be retained until the start of the next season when memberships are renewed.

Data Subject Rights

- Under Data Protection Laws individuals have certain rights in relation to their own personal data. In summary these rights are to:
 - Access their personal data by logging-on to the FullOnSport portal.
 - Have their personal data rectified if inaccurate.
 - Have their personal data erased.
 - Restrict processing of their personal data.
 - Object to receiving direct marketing materials.
 - Portability of their personal data.
 - Object to processing of their personal data.
 - Not be subject to a decision made solely by automated data processing.

Information

- The personal information to be held is listed at Annex A.
 - By entering personal data on the FullOnSport portal and joining the Club, and providing the information requested, the Data Subject consents to the information being retained on the database.

- By entering personal data on the FullOnSport portal and joining the Club, and providing the information requested, the Data Subject consents to the information being processed to enable the proper conduct, operation and function of the Club.
- Personal information will not be passed to any third party, without the permission of the Data Subject.
- Access to personal data on the club database will be controlled by the Membership Secretary, and limited to the post holders listed in Annex B.
 - Access to the data shall be permitted to Club officers in order for them to carry-out their duties (see guidance at Annex C).
- Individually identifiable personal data will be used for, but not limited to:
 - Emergency contact details in case of accidents or injuries.
 - Contact details for captains/coaches/managers organising teams (including for example, but not limited to, telephone numbers, e-mail addresses).
 - Attendance lists for Club events (including for example, but not limited to, names).
- Non-identifiable personal data will be used for, but not limited to:
 - The compilation of statistics and returns (including for example, but not limited to, numbers, age and gender).
 - Identifying the Club's geographical catchment (including for example, but not limited to, postcodes).

Marketing

- The Club does not market or advertise anything that is not associated with hockey.
- From time-to-time, the Club may contact members by email, post or SMS with information about courses, events and club news that may be of interest to members.
- The Club will only send marketing messages to members in accordance with any preferences set by the member.
- Members can inform the Club at any time that they do not wish to receive marketing messages. Members can also unsubscribe from the Club's marketing by clicking on the unsubscribe link in the marketing messages sent to members.

Reporting

- In the first instance Club members should notify:
 - The Membership Secretary if any **personal data is inaccurate**.
 - The Club Secretary if any individual wants to invoke any **rights in relation to personal data relating to them**.
 - The Club Secretary if they become aware of, or suspect, the **loss of any personal data** or any item containing personal data.

ANNEX A

ANNEX B

Personal data (Information) Held on Club Database (FullOnSport)

- Title
- First Name
- Last Name
- Gender
- Date of Birth
- Full Address
- Email Addresses (Primary and Secondary)
- Telephone Numbers (Primary and Secondary)
- Team
- Training Group
- Team Shirt Number
- School
- School Year
- Ethnicity
- Disability
- Emergency Contact Name
- Emergency Contact Telephone Number
- Medical Information

Access to Personal Data Held on Club Database

- Club Officers given Full Access:
 - Club Database Administrator:
 - *Membership Secretary*
 - Other Club Officers:
 - *Club Chairman*
 - *Club Secretary*
 - *Club Treasurer*
- Club Officers given Limited Access to:
 - All Men's Senior Members, and Junior Boys Playing in Senior Teams:
 - *Men's Club Captain*
 - *Men's Team Captains*
 - All Ladies Senior Members, and Junior Girls Playing in Senior Teams:
 - *Ladies Club Captain*
 - *Ladies Team Captains*
 - Junior Academy Members:
 - *Junior Administrator*
- Coaches given Limited Access as required:
 - Senior Members, and Juniors Playing in Senior Teams:
 - *Lead Coach*
 - Junior Academy Members:
 - *Lead Coach*

Guidance on Handling Personal Data

- In order for Club officers to carry-out their duties to enable the proper conduct, operation and function of the Club on a day-to-day basis it may be necessary for them to retain personal information on other media.
- When you process personal data you must ensure that it is accurate, relevant and not excessive in relation to carrying-out your duties.
 - Limit the information retained to that absolutely necessary, such as telephone numbers and e-mail addresses.
- Do not process personal data unless you are sure that the Club has obtained the consent of the individual concerned or that it is necessary to process the personal data to meet a legal obligation.
 - If in any doubt, do not process personal data, and check with the Membership Secretary.
- Do not disclose any information about an individual to an external organisation without first checking that the individual consents to such disclosure, or, in the case of a legal requirement, checking first with the Club Chairman, Club Secretary, Membership Secretary, or Welfare Officer.
 - If you do disclose, or are required to disclose, any information always keep a record of what personal data has been disclosed, to whom, when and how and pass it to the Club Secretary.
 - Do not disclose any personal data to another member of the Club unless it is necessary for them to carry-out their duties.
 - If in any doubt refer any request to disclose any personal data to the Membership Secretary.
- Ensure that all personal data is kept secure from unauthorised access:
 - Be vigilant if you are using personal data:
 - Strict security measures must be applied to the transportation and storage of all such data, electronically or in hardcopy.
 - Apply password protection to storage devices such computers, tablets or phones, and electronic documents.
 - Delete any copy of personal data or destroy any document containing personal data when no longer required.