

Privacy Policy for Broughton and District Club

1. Purpose and Scope

This Privacy Policy outlines how Broughton and District Club (the "Club") collects, uses, stores, and protects personal data in accordance with the General Data Protection Regulation (GDPR) and the Data Protection Act 2018. This policy applies to all members, guests, volunteers, employees, and third parties who interact with the Club's activities. It also covers the Club's use of CCTV for security purposes.

2. Data Controller

The Club is the data controller for personal data collected, and as such, determines the purposes and means of processing this data

3. Data Collection

The Club collects and processes personal data for the following purposes:

- Membership administration and communication. Contact details include:
 - name, address, phone number
 - date of birth (for Junior members only)
 - emergency contact
 - health information (relevant health conditions of Junior members)
- Organising and managing sports events and social activities.
- Security and safety via CCTV surveillance.
- Complying with legal and regulatory requirements.

Personal data is collected directly from members, guests, or other participants in Club activities, or through images (still or video) or CCTV systems on-site

4. Legal Basis for Processing

The Club processes personal data on the following legal bases:

- Contractual necessity: For the administration of membership and related services.
- Legitimate interests: For the general operation of the Club, including event organisation and communication.
- Legal obligation: For complying with health and safety regulations, tax laws, the rules of a Community Amateur Sports Club or other legal requirements.
- Consent: For particular purposes, such as club specific communications

5. Data Retention

The Club will retain personal data only for as long as necessary to fulfil the purposes for which it was collected or to meet legal requirements. Membership information is retained for no more than six months following the non-renewal of a membership, after which it will be securely deleted. For a member terminating their membership, information is securely deleted immediately once known.

CCTV footage is stored for a maximum period of 30 days unless an incident occurs, in which case footage may be retained for investigation purposes

6. CCTV Surveillance

The Club operates CCTV cameras on-site to:

- Ensure the security of members, guests, and property.
- Monitor Club premises for crime prevention and public safety.

Signage is displayed in areas where CCTV is active, informing individuals of its use. The Club ensures that CCTV footage is securely stored and access is restricted to authorised personnel only. CCTV recordings are typically retained for 30 days before being automatically deleted unless required for an investigation

7. Data Sharing

The Club will not share personal data with third parties, except in the following circumstances:

- When required by law (e.g., to law enforcement or regulatory bodies).
- With service providers who help operate the Club's activities (e.g., IT service providers), ensuring that these providers also comply with GDPR requirements.

8. Individual Rights

Under GDPR, individuals have the following rights regarding their personal data:

- Right of access: To request access to their personal data held by the Club. With regard to CCTV footage, an access request must be based on a specific timeframe.
- Right to rectification: To correct inaccurate or incomplete data.
- Right to erasure: To request the deletion of personal data when no longer necessary.
- Right to restrict processing: To limit how the Club processes their data.
- Right to data portability: To receive their data in a structured, commonly used format.
- Right to object: To object to the processing of personal data based on legitimate interests.

Requests to exercise these rights should be made in writing to the Honorary General Secretary at info@broughtonanddistrictclub.co.uk. The Club will respond to such requests within the statutory timeframes.

9. Data Security

The Club takes appropriate technical and organisational measures to protect personal data from unauthorised access, loss, or destruction. These include:

- Password protection for digital records.
- Secure storage for paper records.
- Limited access to personal data for authorised personnel only.
- Regular reviews of security measures.

10. Data Breaches

In the event of a personal data breach, the Club will follow its breach notification procedures, which may involve reporting the breach to the Information Commissioner's Office (ICO) and affected individuals if required by law.

11. Contact and Complaints

For any queries or concerns regarding this policy, or to make a complaint about how the Club handles personal data, please contact the Honorary General Secretary at info@broughtonanddistrictclub.co.uk.

If you are not satisfied with the response, you may contact the Information Commissioner's Office (ICO) at www.ico.org.uk.

12. Review and Updates

This Data Protection Policy will be reviewed annually or as required to ensure continued compliance with data protection regulations.

Updated 17th October 2024