

Data Protection

Data Privacy Notice for Club Members

Written by:

Date: 2018-05-17

John Carter
Membership Secretary

Checked By:

Date:

Gary O'Donnell
Club Chairman

Authorized by:

Date:

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Club Secretary



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DATA PRIVACY NOTICE FOR OUR MEMBERS

We are committed to respecting your privacy. This notice is to explain how we may use personal information we collect before, during and after your membership with us. This notice applies to you if you have registered to become or are a member of our club. This notice explains how we comply with the law on data protection, what your rights are and for the purposes of data protection we will be the controller of any of your personal information.

References to **we**, **our** or **us** in this privacy notice are to the **Broad Oak Sports & Social Club**.

We have not appointed a Data Protection Officer but the Membership Secretary has been tasked to oversee our compliance with data protection laws who has overall responsibility for data protection compliance in our organisation. Contact details are set out in the "Contacting us" section at the end of this privacy notice.

1. PERSONAL INFORMATION WE MAY COLLECT FROM YOU

Depending on the type of membership you register for with us, you may initially provide us with or we may obtain **personal information** about you, such as information regarding your:

- personal contact details that allows us to contact you directly such as name, title, email addresses and telephone numbers;
- date of birth;
- gender;
- membership start and end date;
- records of your interactions with us such as telephone conversations, emails and other correspondence and your instructions to us;
- any credit/debit card and other payment details you provide so that we can receive payments from you and details of the financial transactions with you;
- records of your attendance at any events hosted by us;
- CCTV footage and other information obtained through electronic means such as Membership Card records;
- images in video and/or photographic form and voice recordings;
- your marketing preferences so that we know whether and how we should contact you.
- details of next of kin, family members and emergency contacts;
- any disciplinary and grievance information.

2. SPECIAL CATEGORIES OF PERSONAL INFORMATION

We **do not** collect, store and use the following "**special categories**" of more sensitive personal information regarding you:

- information about your race or ethnicity, religious beliefs and sexual orientation;
- information about your health, including any medical condition, health and sickness records, medical records and health professional information; and
- biometric information about you, for example fingerprints, retina scans.



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3. WHERE WE COLLECT YOUR INFORMATION

We typically collect personal information about our members when you apply to become a member of the club, you register an account with us at broadoaksocial.club and related websites, when you purchase any services we offer, when you make a query and/or complaint or when you correspond with us by phone, e-mail or in some other way.

We also may collect personal information about you from any third party references you provide as part of the application process for membership, e.g. Payroll Number and workplace.

If you are providing us with details of referees, next of kin, beneficiaries, family members and emergency contacts they have a right to know and to be aware of how what personal information we hold about them, how we collect it and how we use and may share that information. Please share this privacy notice with those of them whom you feel are sufficiently mature to understand it. They also have the same rights as set out in the “Your rights in relation to personal information” section below.

4. USES MADE OF THE INFORMATION

The table below describes the main purposes for which we process your personal information, the categories of your information involved and our lawful basis for being able to do this.

Purpose	Personal information used	Lawful basis
To administer any membership you have with us and managing our relationship with you, including dealing with payments and any support, service or product enquiries made by you	All contact and membership details, transaction and payment information, records of your interactions with us, and marketing preferences.	This is necessary to enable us to properly manage and administer your membership contract with us.
To arrange and manage any contracts for the provision of any services or products	Contact details, transaction and payment information. Records of your interactions with us.	This is necessary to enable us to properly administer and perform any contract for the provision of any services and products you have purchased from us.
To send you information which is included within your membership benefits package, including details about advanced ticket information, competitions and events, etc.	Contact and membership details.	This is necessary to enable us to properly manage and administer your membership contract with us. You may choose to receive email on a selection of topics or none at all, apart from payment reminders and statutory notice of AGMs, etc.
To send you information we think you might find useful or which you have requested from us, including our newsletters, information about membership, events.	Contact details and marketing preferences.	Where you have given us your explicit consent to do so.
To answer your queries or complaints	Contact details and records of your interactions with us	We have a legitimate interest to provide complaint handling services to you in case there are any issues with your membership.
Retention of records	All the personal information we collect.	We have a legitimate interest in retaining records whilst they may be required in relation to complaints or claims. We need to retain records in order to properly administer and manage your membership and run our



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		club and in some cases we may have legal or regulatory obligations to retain records. We process special category personal data on the basis of the “special category reasons for processing of your personal data” referred to in section 2 above.
The security of our IT systems	Your usage of our IT systems and online portals.	We have a legitimate interest to ensure that our IT systems are secure.
To conduct data analytics studies to better understand event attendance and trends within the sport	Records of your attendance at any events or competitions hosted by us.	We have a legitimate interest in doing so to ensure that our membership is targeted and relevant.
For the purposes of promoting the club, our events and membership packages.	Images in video and/or photographic form.	Where you have given us your explicit consent to do so.
To comply with health and safety requirements	Records of attendance, CCTV footage and other information obtained through electronic means such as swipecard and key fob records.	We have a legal obligation and a legitimate interest to provide you and other members of our organisation with a safe environment in which to participate in sport or recreation.
To arrange for any trip or transportation to and from an event	Identification documents details of next of kin, family members and emergency contacts, transaction and payment information, health and medical information.	This is necessary to enable us to make the necessary arrangements for the trip and/or transportation to an event.
To gather evidence for possible grievance or disciplinary hearings	All the personal information we collect	We have a legitimate interest in doing so to provide a safe and fair environment for all members and to ensure the effective management of any disciplinary hearings, appeals and adjudications. We process special category personal data on the basis of the “special category reasons for processing of your personal data” referred to in section 2 above.
For the purposes of equal opportunities monitoring	Name, title, date of birth gender.	We have a legitimate interest to promote a sports environment that is inclusive, fair and accessible.
To comply with legal obligations, for example, regarding people working with children or vulnerable adults to comply with our safeguarding requirements	Information about your criminal convictions and offences	For criminal records history we process it on the basis of legal obligations or based on your explicit consent.

For some of your personal information you will have a legal, contractual or other requirement or obligation for you to provide us with your personal information. 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 perform our contract with you or comply with legal obligations and we may have to terminate your membership. For other personal information you may not be under an obligation to provide it to us, but if you do not provide it then we may not be able to properly perform our contract with you.



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Where you have given us your consent to use your personal information in a particular manner, you have the right to withdraw this consent at any time, which you may do by contacting us as described in the "Contacting us" section below.

Please note however that the withdrawal of your consent will not affect any use of the data made before you withdrew your consent and we may still be entitled to hold and process the relevant personal information to the extent that we are entitled to do so on bases other than your consent. Withdrawing consent may also have the same effects as not providing the information in the first place, for example we may no longer be able to provide certain member benefits to you.

5. DIRECT MARKETING

Email, post and SMS marketing: from time to time, we may contact you by email, post or SMS with information about events and services we believe you may be interested in.

We will only send marketing messages to you in accordance with the marketing preferences you set. You can also unsubscribe from our marketing by clicking on the unsubscribe link in the marketing messages we send to you.

6. DISCLOSURE OF YOUR PERSONAL INFORMATION

We share personal information with the following parties:

- If you are a member of a sub-section, e.g. Hockey, then we may share your membership details with the authorized representatives of that sub-section in order to coordinate current players and payment details.

7. TRANSFERRING YOUR PERSONAL INFORMATION INTERNATIONALLY

The personal information we collect is not transferred to and stored in countries outside of the UK and the European Union.

8. HOW LONG DO WE KEEP PERSONAL INFORMATION FOR?

The duration for which we retain your personal information will differ depending on the type of information and the reason why we collected it from you. However, in some cases personal information may be retained on a long-term basis: for example, personal information that we need to retain for legal purposes will normally be retained in accordance with usual commercial practice and regulatory requirements. Generally, where there is no legal requirement we retain all physical and electronic records for a period of [2] years after your last contact with us or the end of your membership. Exceptions to this rule are:

- CCTV records which are held for no more than [30 days] unless we need to preserve the records for the purpose of prevention and detection of crime;



- Details regarding unsuccessful membership applicants where we hold records for a period of not more than [12] months;
- Information that may be relevant to personal injury or discrimination claims may be retained until the limitation period for those types of claims has expired. For personal injury or discrimination claims this can be an extended period as the limitation period might not start to run until a long time after the event.

It is important to ensure that the personal information we hold about you is accurate and up-to-date, and you should let us know if anything changes, for example if you change your phone number or email address. You may be able to update some of the personal information we hold about you through our membership portal. Alternatively, you can contact us by using the details set out in the "**Contacting us**" section below.

9. YOUR RIGHTS IN RELATION TO PERSONAL INFORMATION

You have the following rights in relation to your personal information:

- the right to be informed about how your personal information is being used;
- the right to access the personal information we hold about you;
- the right to request the correction of inaccurate personal information we hold about you;
- the right to request the erasure of your personal information in certain limited circumstances;
- the right to restrict processing of your personal information where certain requirements are met;
- the right to object to the processing of your personal information;
- the right to request that we transfer elements of your data either to you or another service provider; and
- the right to object to certain automated decision-making processes using your personal information.

You should note that some of these rights, for example the right to require us to transfer your data to another service provider or the right to object to automated decision making, may not apply as they have specific requirements and exemptions which apply to them and they may not apply to personal information recorded and stored by us. For example, we do not use automated decision making in relation to your personal data. However, some have no conditions attached, so your right to withdraw consent or object to processing for direct marketing are absolute rights.

Whilst this privacy notice sets out a general summary of your legal rights in respect of personal information, this is a very complex area of law. More information about your legal rights can be found on the Information Commissioner's website at <https://ico.org.uk/for-the-public/>.

To exercise any of the above rights, or if you have any questions relating to your rights, please contact us by using the details set out in the "Contacting us" section below.



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If you are unhappy with the way we are using your personal information you can also complain to the UK Information Commissioner's Office or your local data protection regulator. We are here to help and encourage you to contact us to resolve your complaint first.

10. CHANGES TO THIS NOTICE

We may update this privacy notice from time to time. When 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.

11. RELATED DOCUMENTS

There are six documents in this series: -

- I. BOSSC-DOC-DP-0001 INTERNET ACTIVITIES
- II. BOSSC-DOC-DP-0002 CLUB MEMBERS
- III. BOSSC-DOC-DP-0003 CLUB EMPLOYEES
- IV. BOSSC-DOC-DP-0004 DIRECT MARKETING
- V. BOSSC-DOC-DP-0005 DATA PROTECTION OFFICER
- VI. BOSSC-DOC-DP-0006 EXTERNAL DATA PROCESSORS

PDF Copies are available from: <http://broadoaksocial.club/documents/>



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Document History

Issue	Date	Comment
1	2012-01-15	First Release
2	2018-04-25	Update for GDPR ¹
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12. CONTACTING US

In the event of any query or complaint in connection with the information we hold about you, please email Admin@broadoaksocial.email or write to us at:

Broad Oak Sports & Social Club
Airport Service Road
PORTSMOUTH
PO3 5PB

NB: Our Web and email servers are located within the EEA and subject to UK/European Data Protection Legislation.

The only valid email domains are as follows:

- broadoak.club
- broadoak-snooker.uk
- broadoaksocial.email
- pompey-royals-snooker.uk
- broadoaksocial.club

The **Club** does not use gmail, outlook, hotmail or any other USA domains. The **Club** will not send any personal details to such addresses. The only exception is where a member sends us a communication from such an address, in which case we will reply to their request, e.g. to reserve tickets for an event.

¹ What is GDPR and why change from the Data Protection Act 1998?

Changes to data protection regulations are required as the advances in technology over recent years and the different ways that personal data is now processed (collected, stored, shared, etc.) with this new technology need to be included.

GDPR will give EU* citizens more control over how their personal data is used. It will make it clearer for organisations (including both businesses and clubs) to understand their data protection requirements. However, it will also bring very hefty fines for those who ignore or break the rules – up to 20million euros can be levied.

[* this includes UK citizens as GDPR will still be UK law after Brexit]