



General Data Protection Regulation Policy



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Introduction

Craven Lawn Tennis Club is managed and run by volunteers on behalf of the membership. As part of the General Data Protection Regulations (GDPR) which became law on the 25th May 2018 the committee have reviewed the club's Data Protection Policy. This document sets out the policy regarding:

- The type of data held and purpose for holding the data
- Permissions required from members to use their personal data
- Actions that will be taken if there is a request for access to a member's data
- The actions required when holding data of members under 16 years of age
- The process in place to correct any errors in member information
- The storage of data and access to the information

Overview of the GDPR regulations

GDPR has been introduced by the EU to tighten the rules around holding and processing data (personal information). The regulations allow more rights to individuals and place specific requirements on organisations holding and processing data.

The GDPR regulation principles

Under the GDPR regulations which became law in May 2018 there are 8 principles:

1. Data is processed lawfully, fairly and in a transparent manner in relation to individuals.
2. Data is collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be considered to be incompatible with the initial purposes.
3. Data is adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.
4. Data is accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay.
5. Data is kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes subject to implementation of the appropriate technical and organisational measures required by the GDPR in order to safeguard the rights and freedoms of individuals.
6. Personal data shall be processed in accordance with the rights of data subjects under the Data Protection Act 1998 and from 25th May 2018 the General Data Protection Regulations.
7. Data is processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.
8. 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 for the rights and freedoms of data subjects in relation to the processing of personal data

GDPR rights for individuals

1. The right to be informed
 - The right to be informed encompasses our obligation to provide ‘fair processing information’, typically through a privacy notice.
 - It emphasises the need for transparency over how we use personal data.
2. The right of access
 - Individuals have the right to access their personal data and supplementary information.
 - The right of access allows individuals to be aware of and verify the lawfulness of the processing.
3. The right to rectification
 - The GDPR gives individuals the right to have personal data rectified.
 - Personal data can be rectified if it is inaccurate or incomplete.
4. The right to erasure
 - The right to erasure is also known as ‘the right to be forgotten’.
 - The broad principle underpinning this right is to enable an individual to request the deletion or removal of personal data where there is no compelling reason for its continued processing.
5. The right to restrict processing
 - Individuals have a right to ‘block’ or suppress processing of personal data.
 - When processing is restricted, we are permitted to store the personal data, but not further process it.
 - We can retain just enough information about the individual to ensure that the restriction is respected in future.
6. The right to data portability
 - The right to data portability allows individuals to obtain and reuse their personal data for their own purposes across different services.
 - It allows them to move, copy or transfer personal data easily from one IT environment to another in a safe and secure way, without hindrance to usability.
 - Some organisations in the UK already offer data portability through the midata and similar initiatives which allow individuals to view, access and use their personal consumption and transaction data in a way that is portable and safe.
 - It enables consumers to take advantage of applications and services which can use this data to find them a better deal, or help them understand their spending habits.
7. The right to object

Individuals have the right to object to:

 - processing based on legitimate interests or the performance of a task in the public interest/exercise of official authority (including profiling);

- direct marketing (including profiling); and
 - processing for purposes of scientific/historical research and statistics.
8. Rights in relation to automated decision making and profiling.
- The GDPR has provisions on:
- automated individual decision-making (making a decision solely by automated means without any human involvement)
 - profiling (automated processing of personal data to evaluate certain things about an individual). Profiling can be part of an automated decision-making process.
 - The GDPR applies to all automated individual decision-making and profiling.
 - Article 22 of the GDPR has additional rules to protect individuals if you are carrying out solely automated decision-making that has legal or similarly significant effects on them.
 - You can only carry out this type of decision-making where the decision is:
 - necessary for the entry into or performance of a contract; or
 - authorised by Union or Member state law applicable to the controller; or
 - based on the individual's explicit consent.
 - You must identify whether any of your processing falls under Article 22 and, if so, make sure that you:
 - give individuals information about the processing;
 - introduce simple ways for them to request human intervention or challenge a decision;
 - carry out regular checks to make sure that your systems are working as intended.

Craven Lawn Tennis Club - Data Protection Policy

Our data protection policy sets out our commitment to protecting personal data and how we implement that commitment with regards to the collection and use of personal data.

We are committed to:

- Ensuring that we comply with the eight data protection principles, as listed above
- Meeting our legal obligations as laid down by the Data Protection Act 1998 and the General Data Protection Regulations from 25th May 2018
- Ensuring that data is collected and used fairly and lawfully
- Processing personal data only in order to meet our operational needs or fulfil legal requirements
- Taking steps to ensure that personal data is up to date and accurate
- Establishing appropriate retention periods for personal data
- Ensuring that data subjects' rights can be appropriately exercised
- Providing adequate security measures to protect personal data
- Ensuring that a nominated club officer is responsible for data protection compliance and provides a point of contact for all data protection issues
- Ensuring that all club officers are made aware of good practice in data protection
- Providing adequate training for all staff responsible for personal data
- Ensuring that everyone handling personal data knows where to find further guidance
- Ensuring that queries about data protection, internal and external to the club, are dealt with effectively and promptly
- Regularly reviewing data protection procedures and guidelines within the club

The impact of GDPR on Craven Lawn Tennis Club

As a sports club we have a duty to ensure we meet the requirements of GDPR by obtaining, protecting and using personal data of our members correctly.

The gathering of data:

- Paper application forms from new members
- Paper annual subscription forms from existing members

The data held by the Club Secretary (Data Controller) is as follows:

Member's name(s)
Salutation
Address & Post Code
Home telephone number
Mobile telephone number
Email Address(es)
Name and ages of juniors and students
Type of membership – Family, Single, Student, Junior, Croquet, Country

The data is used to:

- To annually compile a printed Membership List that is distributed to all members.
- To create and maintain an Email Address List which is used to:
 - give members regular updates (occasionally during the autumn, winter and spring months and weekly during the summer season).
 - Enable Captains, committee member and coaches to contact members as and when appropriate.

Club procedures to comply with GDPR

Gathering Data

The data captured is:

- Member's name(s)
- Salutation
- Address & Post Code
- Home telephone number
- Mobile telephone number
- Email Address(es)
- Name and ages of juniors and students
- Type of membership – Family, Single, Student, Junior, Croquet, Country

All this information is relevant and appropriate for the club to maintain a record of club members.

It is necessary to have ages of children and students to determine whether parental authorisation is required under the GDPR rules. The information also assists the club to identify relevant and appropriate coaching activities.

The data is obtained on paper application forms and annual subscription forms. See appendix 1 and 2.

There is a Data Protection statement and 'opt-in' boxes on both forms regarding the retention and use of the data.

The Data Protection statement is:

Craven Lawn Tennis Club will use your personal data for the purposes of your involvement in club activities. Your data will not be shared with any third party and the principles of the General Data Protection Regulations will be adhered to.

Opt-in declaration:

Tick Box. By ticking this box I consent to my name, address and telephone number being added to club's list of members which is sent out to all club members.

Tick Box. By ticking this box I consent to receiving information about the club by post, email/MMS, online or by phone.

(For under 16's)

Tick Box. By ticking this box I consent to my son or daughter's name, address and telephone number being added to club's list of members which is sent out to all club members.

Tick Box. By ticking this box I consent to my son or daughter receiving information about the club by post, email/MMS, online or by phone.

Data storage

Date is held at the home premises of the Data Controller. The data is held in:

- an excel spreadsheet which will be dated and version controlled – 2018 version x
 - an email account with AOL
 - paper membership application forms
 - paper annual subscription forms.
- Security
The excel spreadsheet is password protected. The password is only known by the data Controller and shared with the President, Treasurer, Committee members and the club coach, as and when required.

If the excel spreadsheet is emailed to selected parties, as detailed above, the password will be sent by separate email.

The AOL account details are password protected.

The paper membership application forms and annual subscription forms are stored with the Data Controller in a membership folder.

- Data retention
Information on the excel spreadsheet and in the AOL account will be held until a member cancels their subscription. The information will then be deleted from the AOL account and the excel spreadsheet.

Membership application forms and annual subscription forms will be held for 12 months.

Using data

Membership data is used:

- to create an annual list of members that is distributed to members
- to send regular newsletter updates by email -
all emails will be issued to members using 'Bcc' to ensure the addresses are not published to all members
- by officials of the club to communicate with members
- by club Team Captains to arrange and manage their team players for matches and coaching sessions
- by the club coach to coordinate coaching sessions.

Data is not issued to any third parties or used for marketing purposes.

[Deleting data](#)

When a member does not renew their annual subscription, their data will be deleted from club records:

- excel spreadsheet of member data
The old version of the excel spreadsheet will be deleted from the Data Controller's computer and a new version saved.
- AOL account list of members email addresses

Annual subscription forms and membership application forms (for members joining that year) will be held for 12 months. Annually, once new subscription forms are received, the old forms will be destroyed. The paper forms will be either shredded or burnt.

[Members' access to their data](#)

At any time, a member can ask the Data Controller (Club Secretary) to show them the data held by the club. If there any errors or discrepancies in the information the Data Controller will ensure the information is accurate.

Any member requesting details of their data will be provided with the content, via email or post, within 30 days of the request being made.

Members can request their data is deleted from the club records on the cancellation of membership.

[Website](#)

Permission to publish the names and telephone numbers of club officials on the website must be obtained. Once obtained permission will be deemed to be granted until the club official ceases their role.

Appendix 1



Membership Application Form

I wish to become a SINGLE/ *COUNTRY SINGLE/ FAMILY/ *COUNTRY FAMILY/ STUDENT/ JUNIOR/ CROQUET/ FAMILY CROQUET/ NON-PLAYING member of Craven Lawn Tennis Club.

(*Please note that "Country" members must live AT LEAST 30 miles from Gargrave to qualify).

NAME:

ADDRESS:

.....
HOME AND MOBILE TEL NOS:.....

EMAIL ADDRESS:

OCCUPATION:

NAMES & AGES OF CHILDREN (IF APPLICABLE). (All children in full-time education can be included in a Family Application. Those working and aged 18 years and over but living at home **must** be Single Members in their own right).

Important please complete

Craven Lawn Tennis Club will use your personal data for the purposes of your involvement in club activities. Your data will not be shared with any third party and the principles of the General Data Protection Regulations will be adhered to.

Do you consent to your name, address and telephone number being added to the list of members which is sent out to all club members?

Yes

No

Do you consent to receiving information about the club by post, email/MMS, online or by phone?

Parent or Guardian for member/s under 16 – Name/s:.....

Do you consent to your child/children's name, address and telephone number being added to the list of members which is sent out to all club members?

Do you consent to your child/children receiving information about the club by post, email/MMS, online or by phon

Signature..... Date.....

Please return this completed form to: Mrs E J Whitley, Mevell Hall, 76 High Street, Gargrave, Nr Skipton, BD23 3LX. Tel: 01756 749664. Email:Secretary@craventennis.org.uk Club Website:www.craventennis.org.uk

Appendix 2

EXAMPLE

Membership Subscription renewal

Dear Member,

The Family subscription for this season is £275.00. Please make your cheque payable to: Craven Lawn Tennis Club and send it by May 1st to:

Mr Trevor Dixon.
'Reliance House',
20, Church Street,
Gargrave, Skipton. BD23 3NE

If you prefer to pay by bank transfer, details are as follows:

Yorkshire Bank. Sort code 05-09-09 Account number 17767788.
Please confirm payment via email to: tandsdixon@gmail.com

To enable the club to meet its obligations under the new General Data Protection Regulations please complete this form and tick the boxes to answer the questions below.

I wish to continue my / our membership of Craven Lawn Tennis Club.

NAME:

ADDRESS:

.....

HOME AND MOBILE TEL NOS:.....

EMAIL ADDRESS:

OCCUPATION:

NAMES & AGES OF CHILDREN (IF APPLICABLE). (All children in full-time education can be included in a Family Application. Those working and aged 18 years and over but living at home **must** be Single Members in their own right).

.....
.....
.....

Important please complete

All members

Craven Lawn Tennis Club will use your personal data for the purposes of your involvement in club activities. Your data will not be shared with any third party and the principles of the General Data Protection Regulations will be adhered to.

Yes

No

Do you consent to your name, address and telephone number being added to the list of members which is sent out to all club members?

Do you consent to receiving information about the club by post, email/MMS, online or by phone?

Parent or Guardian for member/s under 16 – Name/s:.....

Do you consent to your child/children's name, address and telephone number being added to the list of members which is sent out to all club members?

Do you consent to your child/children receiving information about the club by post, email/MMS, online or by phone.

Signature..... Date.....

Please return this completed form to: Mr Trevor Dixon at the address above.

Club Website:www.craventennis.org.uk