

Claremont Tennis and Social Club

Data Protection Policy

Draft

October 2024



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Claremont Tennis and Social Club

1 Introduction

1.1 Data Protection Regulation

In the United Kingdom, the General Data Protection Regulation (GDPR) continues to have a significant impact on small clubs and societies. The UK has incorporated GDPR into domestic law, referred to as the UK GDPR, alongside the Data Protection Act 2018. All references to Claremont Tennis and Social club from this point forward will be referred to as 'the club'. By following the guidelines below, the Club ensure that it remains compliant with data protection laws while effectively managing their operations.

In the UK, under the UK GDPR and the Data Protection Act 2018, any organisation, including a small club or society, that collects, stores, or processes personal data is considered a **data controller**. The data controller (The Club) is responsible for ensuring that the data is handled in compliance with the law.

Information Commissioners Office (ICO) Enforcement: The ICO oversees GDPR compliance in the UK. While small clubs are unlikely to face large fines for minor infractions, they could still face enforcement actions, reputational damage, or be required to take corrective measures.

2 Data Collection and Consent

- **Personal Data Handling:** Claremont Tennis and Social Club will ensure that it handles personal data carefully. This includes collecting data such as members' names, addresses, contact details, and any other information necessary for the organisation's activities;
- **Obtaining Consent:** Explicit consent is required when collecting personal data. This means the Club acquire clear and affirmative consent from members, ensuring they understand why their data is being collected and how it will be used. Consent cannot be assumed from silence or inactivity;
- **Sharing Data:** Personal data will not be shared outside the club or with unauthorised individuals without the explicit consent of the data subjects, unless there is a lawful basis for doing so (e.g. legal obligation, vital interests).

3 Data Processing Requirements

- **Lawful Basis for Processing:** The Club will identify and document the lawful basis for processing personal data, such as consent, contractual necessity, or legitimate interest. For example, processing data to manage membership records or communicate about events may be justified under legitimate interests;
- **Minimising Data:** Only the minimum necessary personal data will be collected and processed. The Club will avoid collecting excessive or irrelevant information.

4 Data Security

- **Protecting Data:** The Club will implement appropriate technical and organisational measures to protect personal data. This will include password protection for digital records, secure storage for paper records, and restricted access to data;
- **Data Breaches:** In the event of a data breach, the club will report it to the Information Commissioner's Office (ICO) within 72 hours if it poses a risk to individuals' rights and freedoms. Members affected by the breach will also be informed;
- **Physical Security:** Personal data stored in physical form (e.g., paper records) will be kept in a secure location, such as a locked drawer or cabinet, accessible only to authorised individuals;
- **Digital Security:** Digital data will be protected with appropriate measures, such as strong passwords, encryption, and secure backups. Access to digital data will be restricted to those who need it for their role in the club.

5 Individuals' Rights

- **Access to Data:** The Club acknowledges members have the right to request access to their personal data held by the club. The club will respond to any such requests promptly, typically within one month;
- **Right to Rectification and Erasure:** Members can request corrections to inaccurate data or ask for their personal data to be deleted. The club will comply unless there's a valid reason to keep the data;
- **Right to Object:** Members can object to how their data is processed, such as opting out of receiving newsletters or other communications.

6 Documentation, Compliance and Accountability

- **Documentation:** The club will clearly document who has access to personal data, what data is held, and how it is used. This helps in maintaining accountability and demonstrating compliance with UK GDPR;
- **Record Keeping:** The club will keep up to date records of its data processing activities, including what data is collected, why it's collected, how it's stored, and who has access to it;
- **Privacy Notices:** The club will provide members with a privacy notice that clearly explains how their data will be used. This notice will be readily accessible, e.g. application forms, on the club's website and at meetings.

7 Club Officers and Committee Members

- **Responsibility:** The Club officers, such as the chairperson, secretary, or treasurer, and other committee members, can hold personal data as

part of their role in managing the club. They are responsible for ensuring that this data is kept secure and used only for legitimate purposes related to the club's activities;

- **Access Control:** Access to personal data is limited to those who need it for their specific duties within the club. For example, the treasurer might need access to members' contact and payment information, while the events coordinator might need access to attendance lists.

8 Designated Data Protection Officer (DPO)

- **DPO Requirement:** Though there is no requirement to appoint a Data Protection Officer (DPO) the club has made the decision to designate someone within the club to oversee data protection practices. The Club has appointed Mrs Mary Makin as its Data Protection officer for the Club. The DPO will ensure that the club complies with data protection laws, although the club remains the data controller.

9 Club Members and Volunteers with Specific Roles

- **Data Handling by Members:** Members who have specific responsibilities, such as organising events, managing communications, or maintaining membership records, funding applications may hold personal data. These members will follow the club's data protection policies and ensure that any personal data they handle is secure and used appropriately;
- **Role of Volunteers:** Volunteers who assist with the administration of the club and handle personal data are also responsible for complying with data protection laws. Like officers and committee members, they will ensure data is used only for legitimate club activities and is kept secure;
- **Training and Awareness:** It's important that anyone handling personal data is aware of their responsibilities under UK GDPR, including data security, lawful processing, and responding to data access requests.

10 Third-Party Processors

- **Use of External Services:** If the club uses third-party services to manage personal data (e.g., cloud storage, email marketing platforms, payment processing), these third parties are considered data processors. The club will ensure that these processors are GDPR-compliant and that there is a contract in place outlining the processor's responsibilities;
- **Due Diligence:** The club will conduct due diligence when choosing third-party processors to ensure they meet GDPR standards. This includes reviewing their privacy policies and ensuring data is transferred and stored securely.

11 Impact of Brexit

- **UK GDPR vs. European Union GDPR:** Although the UK GDPR is nearly identical to the European Union (EU) GDPR, clubs with members in the EU must also comply with the EU GDPR, especially if they collect or process data from EU residents.

12 Regular processes for Claremont Tennis and Social Club

- **Conduct a Data Audit:** The Club committee will regularly Identify what personal data is held, how it's used, and whether it's necessary;
- **Develop and Maintain Privacy Notices:** The Club will ensure that privacy notices are clear, concise, and accessible to all members;
- **Train Volunteers and Staff:** The Club will ensure that anyone involved in handling personal data understands UK GDPR obligations;
- **Information Commissioner's Office (ICO):** Regular compliance check with the ICO re compliance and regulatory fees;
- **Regular Review:** The Club will regularly review data protection policies and practices to ensure ongoing compliance with UK GDPR (and EU where necessary).