



## Data Protection Policy

### 1. *Introduction*

- 1.1 The Club is committed to the protection of personal data. Every individual has rights with regard to how their personal data is handled. During the course of our activities we will collect, store and process personal information about our members and we recognise the need to treat it in an appropriate and lawful manner.
- 1.2 The Club recognises that this personal data is subject to certain legal safeguards specified in the Data Protection Act 2018 and the General Data Protection Regulation (GDPR) and other applicable legislation (“the Data Protection Laws”). The Data Protection Laws impose restrictions on how we may use that personal data.
- 1.3 This policy sets out rules on data protection and the legal conditions that must be satisfied in relation to the obtaining, handling, processing, storage, transportation and destruction of personal information.
- 1.4 The Club and its Committee Members adhere to this policy in all cases when carrying out the activities or functions of the Club.

### 2. *Definition of data protection terms*

- 2.1 Data subjects are all living individuals i.e. our members, about whom we hold personal data. A data subject need not be a UK national or resident. All data subjects have legal rights in relation to their personal data.
- 2.2 Personal data means data relating to a living individual who can be identified or identifiable from that data (or from that data and other information in our possession).
- 2.3 Data controllers are the people who or organisations which determine the purposes for which, and the manner in which, any personal data is processed. They have a responsibility to establish practices and policies in line with the Act. We are the data controller of all personal data used in relation to the Club.
- 2.4 Data users include Committee Members whose work involves using personal data. Data users have a duty to protect the information they handle by following this policy.

- 2.5 Data processors include other organisations that are instructed by the Club to process personal data on behalf of the Club.
- 2.6 Processing is any activity that involves use of the data. It includes obtaining, recording or holding the data, or carrying out any operation or set of operations on the data including organising, amending, retrieving, using, disclosing, erasing or destroying it. Processing also includes transferring personal data to third parties.
- 2.7 Sensitive (or Special) personal data includes information about a person's racial or ethnic origin, political opinions, religious or similar beliefs, trade union membership, genetics; biometrics (when used for ID purposes); health, sex life, or sexual orientation. Such sensitive personal data can only be processed under strict conditions, and will usually require the express consent of the person concerned. There are also strict rules applying to the processing of information relating to commission of, or proceedings for, any criminal offence committed or alleged to have been committed by that person, the disposal of such proceedings or the sentence of any court in such proceedings.

### 3. *Data protection principles*

3.1 Anyone processing personal data must comply with the six enforceable principles of good practice. These provide that personal data must be:

- Processed fairly and lawfully and transparently;
- Processed for limited purposes and in an appropriate way;
- Adequate, relevant and not excessive for the purpose;
- Accurate;
- Not kept longer than necessary for the purpose; and
- Secure.

3.2 The Club must also be responsible for and be able to demonstrate compliance with all the principles.

### 4. *The Principles in detail*

#### 4.1 *Fair, lawful and transparent processing*

The Data Protection Laws are intended not to prevent the processing of personal data, but to ensure that it is done fairly and without adversely affecting the rights of the data subject. The data subject must be told who the data controller is (in this case it is the Club), the purpose for which the data is to be processed by us, (this is to manage a running club) and the identities of anyone to whom the data may be disclosed or transferred. We set this all out in the Privacy Notice to all our members which means we meet the transparency requirement.

For personal data to be processed lawfully, certain conditions have to be met. These may include, among other things, requirements that the data subject has consented to the processing, or that the processing is necessary for the legitimate interest of the data

controller or the party to whom the data is disclosed. When sensitive personal data is being processed, more than one condition must be met. In most cases the data subject's explicit consent to the processing of such data will be required.

#### 4.2 *Processing for limited purposes*

Personal data may only be processed for the specific purposes notified to the data subject when the data was first collected or for any other purposes specifically permitted by the Act. This means that personal data must not be collected for one purpose and then used for another. If it becomes necessary to change the purpose for which the data is processed, the data subject must be informed of the new purpose before any processing occurs.

#### 4.3 *Adequate, relevant and non-excessive processing*

Personal data should only be collected to the extent that it is required for the specific purpose notified to the data subject. Any data which is not necessary for that purpose should not be collected in the first place. Where a third party needs personal data for the purposes of providing services to the Club, only the minimum they need should be passed to them.

#### 4.4 *Accurate data*

Personal data must be accurate and kept up to date. Information which is incorrect or misleading is not accurate and steps should therefore be taken to check the accuracy of any personal data at the point of collection and at regular intervals afterwards. Inaccurate or out-of-date data should be destroyed.

#### 4.5 *Retention Periods*

Personal data should not be kept longer than is necessary for the purpose. This means that data should be destroyed or erased from our systems when it is no longer required.

#### 4.6. *Data security*

We must ensure that appropriate security measures are taken against unlawful or unauthorised processing of personal data, and against the accidental loss of, or damage to, personal data.

The Data Protection Laws require us to put in place procedures and technologies to maintain the security of all personal data from the point of collection to the point of destruction.

Committee Members must adhere to the following security rules:

- Member information will be kept online on personal computers of the relevant Committee Member. This will be in a restricted profile or file where only the Committee Member has access. The Committee member at the end of their post on the committee will securely transfer or delete all files to the new Committee Member.
- The membership forms are kept with the Membership Secretary.

- Relevant Committee Member and Run Leader criminal records checks are maintained and kept by the Welfare Officer.
- Complaints are managed and kept by the Club Secretary and the Chairman.
- Hard copy information shall be kept in a secure location and as soon as possible scanned in and stored online as per the above.

#### 6. *Data Security Breach*

Any data security breach whether anticipated or actual, physical or electronic must be reported to the Membership Officer in all cases immediately upon knowledge.

#### 7. *Compliance*

The Club will ensure that all Committee Members are trained on data protection and that disciplinary action is taken for non compliance.

#### 8. *Data Subject Rights*

All member can exercise the following rights:

- Right to be informed – we need to members what we do with their data. This is via the Privacy Notice.
- Right of Access – If someone wants a copy of the Personal Data we hold for them (a Subject Access Request this is called) we need to give them a copy, within one month and there is no charge for this.
- Right to Rectification – This is to correct data that is wrong. We will do this as soon as requested.
- Restriction of Processing or objection to processing – in some cases we may need to stop our processing activity if asked to do so for example if someone wants to stop being a member of the Club.

Any Member who wishes to make a requests should contact the Membership Secretary immediately. Please use [membership@EastGrinsteadRunners.co.uk](mailto:membership@EastGrinsteadRunners.co.uk)

All such requests must be responded to within one calendar month and must be supplied free of charge.

The Club will review this policy annually and communicate any changes to its members as may be required.