

DORKING LAWN TENNIS AND SQUASH CLUB

DATA PROTECTION POLICY

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Abbreviations

Abbreviation	Meaning
CCTV	Closed Circuit TV
DA	Data Administrator
DBS	Disclosure and Barring Service
DLTSC	Dorking Lawn Tennis and Squash Club
DoB	Date of Birth
DPSG	data protection sub-group
GDPR	General Data Protection Regulation
ICO	Information Commissioner's Office
LTA	Lawn Tennis Association

1. About this document

This Data Protection Policy defines the steps that Dorking Lawn Tennis and Squash Club (the Club) takes to ensure compliance with the General Data Protection Regulation (GDPR). It sets out the way in which the Club collects and uses personal data¹. It documents individual's rights. It documents how the Club manages the risk of data breach and handles a data breach event.

2. Identification of Data Controller, Data Administrator and Data Processor

For the purposes of the GDPR and UK data protection laws, the Data Controller is DORKING LAWN TENNIS AND SQUASH CLUB LTD of ROMAN ROAD, DORKING RH4 3ET.

The appointed Data Administrator (DA) is Patricia Jubert, who will manage data protection in the Club. The DA should be contacted about any queries about this policy document.

The DA has formed a data protection sub-group (DPSG) to assist the DA, comprising the Club Administrator (Janet Sutherland) and the Club Secretary (John Barnes).

Globus data (<http://www.globusdata.co.uk/>) are a Data Processor for the Club and hold contact information to enable the internet membership list and booking systems.

3. Types of information collected

The Club collects information from:

- Members (and previous members)
- Non-members who attend a course or event
- Employees (non-members)
- Coaches
- Anyone else around the club not directly employed by the Club, such as gardeners, cleaners.

The following types of personal data may be collected:

- Contact and communications information (including email address(es), telephone numbers, postal address(es) and records of communications and interactions).
- Date of Birth (DoB) for junior members.
- Financial information, including Bank Account details.
- Other information volunteered when making use of the court bookings facilities.

¹ “personal data’ means any information relating to an identified or identifiable natural person (‘data subject’); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person”.

- Details of qualifications, insurance and DBS² checks, where this is either a legal obligation or specified by contract.

Data on health or medical conditions may also be collected, where this has been volunteered, for example so that people can be catered for when attending a Club course/camp.

Section 16 Appendix A: Lawful Basis describes the data collected and data collected in full.

4. How information is collected

Personal data is collected in a few limited ways, namely:

- Directly from the individual, when an application is filled in for membership, if enquiries are made on our website, when information is provided via the Club's internet software or court booking system, or when people interact with the Club during their time as a member in various other ways (for example, enter a competition, renew membership, sign up for a course or lessons).
- From someone who has applied for membership on another's behalf (for example a family member or a coach provides the Club with contact details for that purpose).
- From the Lawn Tennis Association (LTA) or Squash England (for example, where details are passed to the Club in connection with a complaint or query raised about the Club).
- CCTV for security reasons and watching live squash on courts A and B. This data is held securely and automatically deleted after 28 days.
- From information provided when entering into a contract with the Club (as a coach, for example).

5. How personal data is used

Personal data provided to the Club shall only be used for the purposes set out at the time of collection and, where relevant, in accordance with any preferences expressed.

More generally, personal data may be used by the Club for the following purposes:

- Administration of Club membership, including:
 - Providing information about court / facilities opening hours;
 - Taking payment of membership fees;
- Fulfilment of orders for goods and services, including court bookings;
- Where necessary for the performance of a contract (including any written terms and conditions relating to membership);
- Research and statistical analysis about who is playing tennis/squash in the Club;
- Communication about Club activities thought to be of interest;

² The Disclosure and Barring Service (DBS) check helps employers make safer recruitment decisions and prevent unsuitable people from working with vulnerable groups, including children. It replaces the Criminal Records Bureau (CRB) and Independent Safeguarding Authority (ISA).

- Storing personal details on the software system (Globus) used for the online Club member management database / court booking system. Note that use of the software system is subject to the Terms and Conditions and Privacy Policy published by that site, a copy of which is available from the Club Administrator.
- Where necessary for the Club's legitimate interests (for example in increasing use of our Club's facilities and participation in the games generally);
- Promoting the Club and promoting goods and services of third parties (for example, operators of coaching courses, and the organisers of tennis and squash events) where the Club thinks this is of interest;
- Where this is necessary for our legitimate interests (or the legitimate interests of a third party) and/or where consent has been obtained, as applicable;
- Administration of the Wimbledon ballot.

6. Data audit

The DPSG is charged with ensuring the following:

- Only personal data actually needed for the Club's specified purposes is collected.
- The Club has sufficient personal data to properly fulfil those purposes.
- Periodically, as a minimum yearly, reviewing the data held and deleting anything that is not needed.
- Maintaining an audit record of the data types held, for both members and non-members.
- After creating the initial record, if at any time the data held is proposed to be extended/changed, the change shall be tested against the requirements of GDPR and the audit record updated, see Appendix A.

7. Marketing preferences

The Club shall ensure that members are informed of how they can express their wishes regarding communications and can easily inform the Club of those wishes.

The Club shall record and respect member's wishes in respect of what types of communication are wished to be received from the Club and how they are wished to be received.

There are some communications, however, that need to be sent regardless of marketing preferences in order for us to fulfil the Club's contractual obligations to members. Examples of these essential service communications are:

- Records of transactions, such as payment receipts;
- Membership related mailings such as membership renewal reminder, notices of formal meetings and information about Club closures and holiday opening hours.

Each member controls how the Club communicates with them.

Choices and/or contact details can be updated by contacting the Club at:

Telephone: 07553 772877

Email: dltsc@gmail.com

Post: DLTSC, Roman Road, Dorking, Surrey, RH4 3ET

8. Sharing information

The Club shall not sell personal data. The Club shall not share personal data for others to use other than as set out below.

Personal data collected and processed by the Club may be shared with the following, where necessary:

- Board members, employees and volunteers, for the purposes of administering the membership and giving access to the membership benefits to which members are entitled;
- Coaches in order to inform members of their services and courses,

The DA shall ensure that any recipient of personal data is aware that the data must be held securely at all times.

The DA shall ensure that when Personal data is shared for an event, the recipient is aware that the data must be destroyed once the event is over.

8.1. England Squash and the LTA

A new member's pack is given to each new Club member. Depending on the membership type the new member is given information about how they may join England Squash and the LTA, which the Club provides at no additional cost. Joining England Squash or the LTA is a choice made by the member. The Club does not inform either England Squash or the LTA that the Club has new member.

When tennis tournaments are run by the Club the Head Coach uses software made available by the LTA called tennis tournament planner (TTP). This enables the coach, as a licenced user, to create a tournament and populate the tournament with people who wish to play by selecting their names from the LTA database. The tool then allows him to specify things like the type of tournament, courts being used, automatically generates the draw for him, etc. In order to become a licenced user of the LTA software, the coach has to satisfy certain criteria such as having been DBS checked.

9. How long information is kept

The DPSG shall ensure that personal data is only kept by the Club for as long as necessary for each purpose for which it is used. For most membership data, this means the Club retains it for so long as there is a valid Club membership and for a period of three years after the last interaction with the Club. The time that data is held by the Club is detailed in Section 16 Appendix A: Lawful Basis.

This shall be facilitated by an annual check of the members/ ex-members database after the yearly renewal of membership is complete.

10. Member rights

Members have the right to:

- Request access to their personal data (commonly known as a "data subject access request"). This enables a member to receive a copy of the personal data held about them and to check that the Club is lawfully processing it. The Club shall make best endeavours to ensure that this information is provided within one month. There is no charge for this service;
- Request correction of the personal data held about them. This enables a member to have any incomplete or inaccurate information held about them corrected;
- Request erasure of personal data. This enables a member to ask the Club to delete or remove personal data where there is no good reason for the Club continuing to process it. A member also has the right to ask the Club to delete or remove their personal data where the right to object to processing data is exercised (see below);
- Object to processing of personal data where the Club is relying on a legitimate interest (or those of a third party) and there is something about the particular situation that makes a member want to object to processing on this ground. A member also has the right to object where the Club is processing his personal data for direct marketing purposes;
- Request the restriction of processing of personal data. This enables a member to ask the Club to suspend the processing of their personal data, for example if a member wants the Club to establish the accuracy of the data or the reason for processing it. A member can also withdraw their consent, where this is the basis for the Club's processing of a member's data (without affecting the lawfulness of our previous processing based on consent);
- Request the transfer of personal data to another party. Confirmation of transfers shall be provided.

Please note that the above rights are not absolute, and the Club may be entitled to refuse requests where exceptions apply.

To exercise any of these rights contact the DA, see Section 15.

11. Security

The Club holds personal data:

- On Club computers. Club computers shall be protected by a password known to the Club Administrators and kept in a secure location.
- Currently, data on the computers is backed up to removable hard disks. However, it is expected that in the future data will be backed up to 'cloud' storage and the removable hard disks will no longer be necessary. The removable hard disks shall be kept in a secure location.

11.1. Personal data shared with Club members, including coaches

Personal data collected and processed by the Club may be shared with Board members, employees, volunteers and coaches, for the purposes of administering the membership and giving access to the membership benefits to which members are entitled.

Personal data provided electronically shall be kept securely on a password protected computer. Both the computer and any data provided in paper form shall be kept in a secure location.

The DA shall ensure that these requirements and the need to meet the further requirements of GDPR shall be embodied within the signed contracts between the coaches and the Club.

11.2. Data Processors

The DA shall ensure that written assurance has been received from any data processor used by the Club.

Note: Globus data are currently a data processor for the Club and hold contact information to enable the internet membership list and booking system. Access to the online membership services are password controlled. However, password control to access a member's contact details is not considered necessary within the Club pavilion so that in exceptional situations another member can be contacted.

12. Management of a data breach

From 25 May 2018 notification of personal data breaches is mandatory.

Examples of a data breach are:

- Reports with member details lost/stolen
- Club software hacked
- Club computer containing member data is lost or stolen
- Member data displayed on noticeboard without notification/permission

If a security incident takes place, the DA shall quickly establish whether a personal data breach has occurred and, if so, promptly take steps to address it, including telling the Information Commissioner's Office (ICO) if required.

When a personal data breach has occurred, the DA shall establish the likelihood and severity of the resulting risk to people's rights and freedoms. If it's likely that there will be a risk then the ICO shall be notified; if it's unlikely then it does not have to be reported. However, if decided that the breach does not need to be reported, this shall be justified and documented in a Data Breach register.

A significant data breach is one that can have a range of adverse effects on individuals, which include emotional distress, and physical and material damage. Some personal data breaches will not lead to risks beyond possible inconvenience to those who need the data to do their job. Other breaches can significantly affect individuals whose personal data has

been compromised. The DA shall assess each breach, case by case, looking at all relevant factors.

12.1. Data breach reporting to the supervisory authority

When reporting a breach, the GDPR says the following must be provided:

- a description of the nature of the personal data breach including, where possible:
 - the categories and approximate number of individuals concerned; and
 - the categories and approximate number of personal data records concerned;
- the name and contact details of the DA or other contact point where more information can be obtained;
- a description of the likely consequences of the personal data breach; and
- a description of the measures taken, or proposed to be taken, to deal with the personal data breach, including, where appropriate, the measures taken to mitigate any possible adverse effects.

It shall be a duty for all persons for whom GDPR training has been undertaken, as listed in Section 13, if they become aware that there has been a data breach to report it as soon as practical to the DA, see Section 15. If the DA is not available, a member of the DPSG shall be contacted.

The DA shall notify the ICO within 72 hours of awareness of breach if the breach is “likely to result in a risk to the rights and freedoms” of individuals. The DA shall also notify affected individuals.

Further information can be found on the ICO website: [ICO Personal Data Breaches](#)

13. Training

To ensure that the requirements of GDPR are met, the Club shall provide training for the DA, Chairman and members of the DPSG. The date when that training is undertaken and the type of training shall be recorded by the Club Administrator.

All Board members shall be familiar with this document.

Coaches are required by their contracts to be aware of GDPR requirements.

14. Club Documents – Privacy Notices

Club documents/ forms, both paper and electronic shall contain the appropriate privacy notices given below. Note that whilst these notices must be on the paper forms there is some flexibility about where they are put. For example, if difficult to fit on the main page with all the main details, the notice can be put on the reverse side.

14.1. Adult Membership joining and renewal forms

The membership joining and renewal forms shall have the following privacy notice on them:

Why we need your personal information – contractual purposes

We need to collect your personal information so that we can process and manage your membership. We will use your personal information to:

- *Manage the administration of your membership on our online membership computer system*
- *Process your due payments and record said payments on our accounting computer system*
- *Send you membership communications in relation to essential aspects of membership of the club, including but not limited to membership renewals, club annual general meetings, club events and activities.*

Any queries regarding personal information should be addressed to the Club's Data Administrator.

14.2. Junior Membership joining form

The membership joining form for minis and juniors shall have the following privacy notices on them:

Why we need your personal information – contractual purposes

We need to collect your personal information so that we can process and manage your membership. We will use your personal information to:

- *Manage the administration of your membership on our online membership computer system*
- *Process your due payments and record said payments on our accounting computer system*
- *Send you membership communications in relation to essential aspects of membership of the club, including but not limited to membership renewals, club annual general meetings, club events and activities.*

Why we need your personal information – vital interests

We need to process certain personal information relating to you for the purposes of ensuring that when engaged in activities at the club your vital interests are protected, namely:

- *We require details of any relevant medical condition that may have an impact on your health and well-being whilst you are participating in activities at the club.*
- *We require details of a parent/guardian who we may contact in the case of an emergency.*

Any queries regarding personal information should be addressed to the Club's Data Administrator.

14.3. General Courses and Events – Non-members

Forms for courses and events shall have the following privacy notices on them:

Why we need your personal information – contractual purposes

We need to collect your personal information so that we can process and manage your application. We will use your personal information to:

- *Manage the administration of your application.*
- *Process your due payments and record said payments on our accounting computer system.*

Why we need your personal information – vital interests

We need to process certain personal information for the purposes of ensuring that when you are engaged in activities at the club your vital interests are protected, namely:

- *We require details of any relevant medical condition that may have an impact on your health and well-being whilst you are participating in activities at the club.*

Details regarding medical conditions are deleted once the activity is complete.

Any queries regarding personal information should be addressed to the Club's Data Administrator.

14.4. Emails to advertise Club events and Newsletters

The following privacy notice should be used on emails to members until such time as either the website is updated to allow members to control their preferences from the website or until it is determined that this will not be possible. The notice should be displayed in a font that is smaller than the main body of the message but it must still be legible. Once the website has been updated this notice must be updated appropriately.

As you will have heard, on the 25th May 2018, the new General Data Protection Regulation (GDPR) came into effect. The Club is working to provide you with more control over how we contact you and the means to do so easily. We hope to be able to offer the facility to decide whether you wish to receive emails such as this by changing choices in the 'Member Info' section of the 'Membership List and Booking System' web page. However, in the interim, in order to stop receiving emails like this one, please contact the Club Administrator, Janet Sutherland, either by email or phone (07553 772877).

14.5. Coaching Contracts

To ensure compliance with GDPR, coaching contracts shall include the following commitments, suitably personalised for the specific contract:

- Coaches engaged by DLTSC must keep abreast with the current GDPR regulations.
- Coaches must provide DLTSC with a copy of their Data Protection Policy Document if they store information on their computers or in paper form.
- Coaches must be familiar with the DLTSC Data Protection Policy.

- It is their duty to ensure that coaches that they engage are fully aware of GDPR and the DLTSC Data Protection Policy.
- Information given to coaches must be held securely.
- Any information regarding medical conditions deemed necessary for a child's or adult's wellbeing should be kept securely and destroyed on completion of the course or event taking place.

14.6. Event Photographs

The Club may take photographs of adults and children who have entered a competition but they must be told about the possibility that photographs may be taken and what they may be used for. The following privacy notice should be added to any event/course entry form at which photographs may be taken by the Club:

Photographs may be taken during the event and may be used to report on the event, both within the Club newsletter, Club website and local press.

14.7. Audrey Hughes Open Tennis Tournament

This annual tournament is open to both members and non-members between the ages of 10 – 17. The event is announced on the Club website and flyers are produced for local schools and tennis clubs to publicise the event. Essential information such as name and contact details are collected on the tournament application form. In addition to this the entrant's current school and tennis club are requested.

The DA shall ensure that all application forms are shredded at the conclusion of the tournament having first listed all the schools that the competitors attend and all the tennis clubs. No personal data shall be recorded with this data. The data is only required to assist in ensuring that the following year's flyers are made available at the schools and tennis clubs where interest has been shown in the completion in the past.

A professional photographer is normally on hand at the tournament to take pictures as requested by the parents. The DA shall ensure that the photographer has a GDPR privacy policy and has been DBS checked. The DA shall make the privacy policy available to anyone wishing to see it during the tournament.

The application form shall state the following:

Why we need your personal information – contractual purposes

We need to collect your personal information so that we can process and manage your application. We will use your personal information to:

- *Manage the administration of your application.*
- *Process your due payments and record said payments on our accounting computer system.*

Why we need your personal information – vital interests

We need to process certain personal information for the purposes of ensuring that when you take part in the tournament your vital interests are protected, namely:

- *We require details of any relevant medical condition that may have an impact on your health and well-being whilst you are participating in the tournament at the club.*

We request your current school and tennis club in order to identify which schools and tennis clubs should be told about next year's competition. The data retained is just a list of schools and tennis clubs with no associated personal data.

No personal data from the application forms is put onto a computer and all application forms are shredded once the tournament is complete.

15. Contact and complaints

For any queries about this policy, how the Club processes member personal data, if any data breach is identified or any member rights are wished to be exercised, contact the Data Administrator, Patricia Jubert:

- by email: jubertjr@globalnet.co.uk
- by telephone: 01306 880804
- or by post: DLTSC, Roman Road, Dorking

If a member is not satisfied with how the Club is processing personal data, a complaint can be made to the Information Commissioner. More can be found out about rights under applicable data protection laws from the Information Commissioner's Office website: www.ico.org.uk.

16. Appendix A: Lawful Basis

The Club has reviewed the personal data that it holds and determined the one or more lawful basis on which data is recorded and used. This is documented in the table in this section.

There are six lawful bases, which are, briefly, as follows:

- **Contract:** this is where the club has a contractual agreement with the individual, e.g. joining the club as a member or signing up to participate in an event.
- **Legal Obligation:** this is where the club is legally obliged to collect individual data to fulfil its legal obligations, e.g. child protection obligation.
- **Vital Interests:** this is where the club requires individual data that directly relates to the protection of an individual's vital interest (threat to life), e.g. medical details.
- **Public Task:** Not relevant to a sports club.
- **Legitimate Interests:** this is where the club requires individual data for tasks that are necessary and related to the club's primary purpose/objectives, e.g. sending members information about club volunteering and working parties, taking promotional photos at club competition events
- **Consent:** this must be used if holding the data cannot be justified any of the other lawful bases. Consent to hold the data must be obtained and it requires a positive opt-in. Once given the consent can be withdrawn.

Further detail can be found at www.ico.org.uk.

16.1. GDPR Data Audit Table

An audit of the personal data held by the Club has been conducted. This table is the result of that audit. Each type of data held by the club is listed and a series of questions asked about the data. The meaning of each question is amplified in the following section, 16.2.

TYPE OF PERSONAL DATA	IS THIS 'SPECIAL CATEGORY' PERSONAL DATA OR CRIMINAL CONVICTIONS?	SOURCE OF PERSONAL DATA?	IS INDIVIDUAL AWARE YOU HOLD THEIR DATA, AND WHY?	LEGAL BASIS FOR HOLDING DATA / HAS THE INDIVIDUAL GIVEN INFORMED CONSENT?	WHAT DO YOU DO WITH THE DATA? AND – WHAT MIGHT YOU WANT TO USE DATA FOR?	DO YOU SHARE DATA WITH ANYONE ELSE?	HOW IS DATA HELD?	IS DATA EVER ARCHIVED / DESTROYED – AD HOC / ROUTINELY?	IS DATA EVER TRANSFERRED / USED OUTSIDE UK/EU?	ANY SPECIFIC CONCERNS?
Bar Staff Contact details	No	Employee	Yes on signing HMRC Starter form for payroll	Contract	To contact regarding staffing the bar	All bar staff are in a WhatsApp group, Mapperson Price Accountants	Contact details are held on a WhatsApp group	Kept on the WhatsApp group until no longer a member of the bar staff	No	No

TYPE OF PERSONAL DATA	IS THIS 'SPECIAL CATEGORY' PERSONAL DATA OR CRIMINAL CONVICTIONS?	SOURCE OF PERSONAL DATA?	IS INDIVIDUAL AWARE YOU HOLD THEIR DATA, AND WHY?	LEGAL BASIS FOR HOLDING DATA / HAS THE INDIVIDUAL GIVEN INFORMED CONSENT?	WHAT DO YOU DO WITH THE DATA? AND – WHAT MIGHT YOU WANT TO USE DATA FOR?	DO YOU SHARE DATA WITH ANYONE ELSE?	HOW IS DATA HELD?	IS DATA EVER ARCHIVED / DESTROYED – AD HOC / ROUTINELY?	IS DATA EVER TRANSFERRED / USED OUTSIDE UK/EU?	ANY SPECIFIC CONCERNS?
Bar Staff pay details	No	Employee	Yes on signing HMRC Starter form for payroll	Contract	To remunerate	Mapperson Price Accountants	Club computer and back up	Kept until termination of employment	No	No

TYPE OF PERSONAL DATA	IS THIS 'SPECIAL CATEGORY' PERSONAL DATA OR CRIMINAL CONVICTIONS?	SOURCE OF PERSONAL DATA?	IS INDIVIDUAL AWARE YOU HOLD THEIR DATA, AND WHY?	LEGAL BASIS FOR HOLDING DATA / HAS THE INDIVIDUAL GIVEN INFORMED CONSENT?	WHAT DO YOU DO WITH THE DATA? AND – WHAT MIGHT YOU WANT TO USE DATA FOR?	DO YOU SHARE DATA WITH ANYONE ELSE?	HOW IS DATA HELD?	IS DATA EVER ARCHIVED / DESTROYED – AD HOC / ROUTINELY?	IS DATA EVER TRANSFERRED / USED OUTSIDE UK/EU?	ANY SPECIFIC CONCERNS?
Employee contact details (not Bar Staff)	No	Employee	Yes on signing contract unless already a club member. No additional data is held for an employee above that which is held for a member.	Contract	To contact regarding employment matters	No	Club computer and back up	Kept until termination of employment	No	No
Employee pay details (not Bar Staff)	No	Employee	Yes on signing contract/starting employment	Contract	To remunerate	Mapperson Price Accountants	Club computer and back up	Kept until termination of employment	No	No
Club member contact details	No	Member/guardian	Yes on application	Contract	Contact regarding: Membership, club events and activities, AGM, EGM, newsletters	Globus, Club coaches	Club computer and back up Globus	Kept until membership ceases	No	No

TYPE OF PERSONAL DATA	IS THIS 'SPECIAL CATEGORY' PERSONAL DATA OR CRIMINAL CONVICTIONS?	SOURCE OF PERSONAL DATA?	IS INDIVIDUAL AWARE YOU HOLD THEIR DATA, AND WHY?	LEGAL BASIS FOR HOLDING DATA / HAS THE INDIVIDUAL GIVEN INFORMED CONSENT?	WHAT DO YOU DO WITH THE DATA? AND – WHAT MIGHT YOU WANT TO USE DATA FOR?	DO YOU SHARE DATA WITH ANYONE ELSE?	HOW IS DATA HELD?	IS DATA EVER ARCHIVED / DESTROYED – AD HOC / ROUTINELY?	IS DATA EVER TRANSFERRED / USED OUTSIDE UK/EU?	ANY SPECIFIC CONCERNS?
Club member DoB – juniors and minis only	No	Member/guardian	Yes on application	Contract	Contact regarding: Membership, club events and activities, AGM, EGM, newsletters	Globus, Club coaches	Club computer and back up Globus	Kept until membership ceases or no longer a junior	No	No
Club member contact preferences	No	Member/guardian	Yes on application	Legitimate Interest	Contact regarding: Newsletters and offers thought to be of interest.	Globus	Club computer and back up Globus	Kept until membership ceases	No	No
Club member allergies /medical conditions – juniors and minis only	No	Parent/guardian	Application form	Vital Interest	In case of emergency	Club coaches	Only held on application form	Kept until membership ceases or until no longer a junior	No	No
Club member emergency contact details – juniors and minis only	No	Parent/guardian	Application form	Vital Interest	In case of emergency	Globus, Club coaches	Globus	Kept until membership ceases or until no longer a junior	No	No

TYPE OF PERSONAL DATA	IS THIS 'SPECIAL CATEGORY' PERSONAL DATA OR CRIMINAL CONVICTIONS?	SOURCE OF PERSONAL DATA?	IS INDIVIDUAL AWARE YOU HOLD THEIR DATA, AND WHY?	LEGAL BASIS FOR HOLDING DATA / HAS THE INDIVIDUAL GIVEN INFORMED CONSENT?	WHAT DO YOU DO WITH THE DATA? AND – WHAT MIGHT YOU WANT TO USE DATA FOR?	DO YOU SHARE DATA WITH ANYONE ELSE?	HOW IS DATA HELD?	IS DATA EVER ARCHIVED / DESTROYED – AD HOC / ROUTINELY?	IS DATA EVER TRANSFERRED / USED OUTSIDE UK/EU?	ANY SPECIFIC CONCERNS?
Club member bank details	No	Member, if needed	To facilitate reimbursement of funds	Contract	Reimbursement	Club's bank	Data is setup on the Club's bank account.	Details are deleted once the membership ceases	No	No
Previous member contact details	No	Previous member	Yes on application	Contract	Keeping in touch	No	Club computer and back up Globus (as a deactivated member)	Keep until asked to remove or after 3 years	No	No
Non-member contact details (when attending course/event)	No	Course/event applicant or guardian	Yes on application	Contract	Contact regarding course/activity	Club coaches	Only held on application form	Kept for the duration of the course/event and then destroyed.	No	No
Non-member DoB/age – juniors and minis only (when attending course/event)	No	Member/guardian	Yes on application	Contract	To facilitate running of course/event	Club coaches	Only held on application form	Kept for the duration of the course/event and then destroyed.	No	No

TYPE OF PERSONAL DATA	IS THIS 'SPECIAL CATEGORY' PERSONAL DATA OR CRIMINAL CONVICTIONS?	SOURCE OF PERSONAL DATA?	IS INDIVIDUAL AWARE YOU HOLD THEIR DATA, AND WHY?	LEGAL BASIS FOR HOLDING DATA / HAS THE INDIVIDUAL GIVEN INFORMED CONSENT?	WHAT DO YOU DO WITH THE DATA? AND – WHAT MIGHT YOU WANT TO USE DATA FOR?	DO YOU SHARE DATA WITH ANYONE ELSE?	HOW IS DATA HELD?	IS DATA EVER ARCHIVED / DESTROYED – AD HOC / ROUTINELY?	IS DATA EVER TRANSFERRED / USED OUTSIDE UK/EU?	ANY SPECIFIC CONCERNS?
Non-member allergies /medical conditions – juniors and minis only (when attending course/event)	No	Member/guardian	Application form	Vital Interest	In case of emergency	Club coaches	Only held on application form	Kept for the duration of the course/event and then destroyed.	No	No
Non- member emergency contact details – juniors and minis only (when attending course/event)	No	Parent/guardian	Application form	Vital Interest	In case of emergency	Club coaches	Only held on application form	Kept for the duration of the course/event and then destroyed.	No	No
Coaches contact details	No	Coach/contract	Yes on application	Contract	To contact regarding club matters	Globus	Contract, Club computer and back up Globus	Kept for duration of contract	No	No

TYPE OF PERSONAL DATA	IS THIS 'SPECIAL CATEGORY' PERSONAL DATA OR CRIMINAL CONVICTIONS?	SOURCE OF PERSONAL DATA?	IS INDIVIDUAL AWARE YOU HOLD THEIR DATA, AND WHY?	LEGAL BASIS FOR HOLDING DATA / HAS THE INDIVIDUAL GIVEN INFORMED CONSENT?	WHAT DO YOU DO WITH THE DATA? AND – WHAT MIGHT YOU WANT TO USE DATA FOR?	DO YOU SHARE DATA WITH ANYONE ELSE?	HOW IS DATA HELD?	IS DATA EVER ARCHIVED / DESTROYED – AD HOC / ROUTINELY?	IS DATA EVER TRANSFERRED / USED OUTSIDE UK/EU?	ANY SPECIFIC CONCERNS?
Coaches DBS number and renewal date	Yes	Coach	Yes on application	Legal Obligation	Keep current	No	Club computer and back up	Kept for duration of contract	No	No
Coaches Qualifications	No	Coach	Yes on application	Contract	Keep current	No	Club computer and back up	Kept for duration of contract	No	No
Coaches Insurance	No	Coach	Yes on application	Contract	Keep current		Club computer and back up	Kept for duration of contract	No	No

Notes of Clarification:

1. The only staff employed by the Club are the Club Administrator and the bar staff. The cleaner, gardener and coaches are suppliers, not employees. The cleaner and gardener invoice the Club for their work, are self-employed and work elsewhere. Payments to the coaches are governed by their contracts
2. Suppliers' details are held on Sage accounts on a Club computer. The accounts are given to the Club's accountants, Mapperson Price, quarterly. Their details are also kept in the Club's bank account (Lloyds) for payment.
3. Suppliers contact details, for those that invoice the Club by email are kept on email records.
4. Backup is currently an external hard disk. It is anticipated that the Club will move to a 'cloud' based internet solution in the future.

16.2. Data Category Definitions

The Audit Table in Section 16.1 examines each type of data in detail held by the club. The following table amplifies the meaning of each of the columns and how they have been populated.

Data Type	Data Definition
TYPE OF PERSONAL DATA	This column identifies all personal data types held by the club in sufficient detail that all further columns can be populated.
IS THIS 'SPECIAL CATEGORY' PERSONAL DATA OR CRIMINAL CONVICTIONS?	This column is used to identify whether the Club holds any more sensitive data, such as race, ethnic origin, politics, religion, trade union membership, genetics, biometrics (where used for ID purposes), health, sex life or sexual orientation.
SOURCE OF PERSONAL DATA?	This column identifies from where the Club obtains the data and how. Often it is from the individual him/herself, but not always.
IS INDIVIDUAL AWARE YOU HOLD THEIR DATA, AND WHY?	This column is a check that individuals are aware that the Club holds their data by defining how they are aware. This is likely to be privacy policies, coaching or employment contracts, data collection forms / consent forms, etc.
LEGAL BASIS FOR HOLDING DATA / HAS THE INDIVIDUAL GIVEN INFORMED CONSENT?	This column addresses the legal basis for the data being held and if consent is needed, how it was obtained.
WHAT DO YOU DO WITH THE DATA? AND – WHAT MIGHT YOU WANT TO USE DATA FOR?	This document and the contents of the table in Section 16.2 are the result of an audit of personal data use and purposes. The use of the data has been considered, including the use that it might put to in the future. An essential part of the audit is consideration of whether all of the data is needed.
DO YOU SHARE DATA WITH ANYONE ELSE?	This column lists anyone with whom the Club shares personal data, for example. contractor, consultant, cloud IT provider volunteers, other bodies or federations, family members.

Data Type	Data Definition
HOW IS DATA HELD?	This includes paper-based filing / lock-and-key; email folders; intranet; electronic management systems; working from home; mobile devices. Any data security concerns are considered.
IS DATA EVER ARCHIVED / DESTROYED – AD HOC / ROUTINELY?	The questions asked to address this were, for example, what happens to emails after a set period; does the Club have a retention of records policy; what about incident reports? How long does the data need to be kept?
IS DATA EVER TRANSFERRED / USED OUTSIDE UK/EU?	This question is relevant if staff work from around the world or for cloud storage purposes. Legal safeguards could potentially be needed if this is the case.
ANY SPECIFIC CONCERNS?	This column allows for any thoughts / concerns / questions not covered by other columns – or areas of particular risk to be captured.