

Data Protection Policy

Dundee East Girls Football Club

Last updated	29/09/2024
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### **Purpose of this policy**

The purpose of our privacy policy is to let you know:

- how and why we collect your personal data;
- how we use and disclose your personal data (and to whom);
- how we protect your personal data; and
- your legal rights and how the law protects you.
- Member clubs are expected to have their own Data Protection Policy where applicable.

## Definitions

<b>Club</b>	means Dundee East Girls Football Club		
<b>GDPR</b>	means the General Data Protection Regulation.		
<b>Responsible Person</b>	means the Club Secretary		
<b>Register of Systems - Personal Data Processed by the Club</b>	<ul style="list-style-type: none"> <li>• Lists of players and their parents/carers</li> <li>• Emails sent to and received by club officials</li> </ul>		
	Processing Purpose	Lawful basis for processing	Type of Data Processed
	Registration of Players	Contract & Consent	<ul style="list-style-type: none"> <li>• Code of Conduct Acceptance</li> <li>• Name, address, DoB of parent/guardian registering</li> <li>• Name, DoB, medical information and Emergency contacts of dependant.</li> <li>• Kit sizing data to assist teamwear purchasing.</li> <li>• Gender data – parent and dependant.</li> <li>• Parent/adult member employer.</li> <li>• Parental consents for trips, first aid and social media</li> <li>• Volunteering sign up (of those willing)</li> <li>• Occupation.</li> <li>• Employer fund matching.</li> <li>• Insurance renewal dates.</li> <li>• Gift Aid declaration for processing of eligible gift aid.</li> </ul>
	Enquiries (via email)	Legitimate Interest	<ul style="list-style-type: none"> <li>• Name, email address</li> </ul>
	Incident and accident reporting	Legal Obligation	<ul style="list-style-type: none"> <li>• Name, address, email address, DOB. accident narrative.</li> </ul>
	Communication about activities	Consent	<ul style="list-style-type: none"> <li>• Name, address, email address</li> </ul>
	Legal and Legislative purposes (e.g. if required for investigation by police or other regulatory government bodies)	Legal	<ul style="list-style-type: none"> <li>• All data held as required by law.</li> </ul>
	Delivery of our management responsibility to volunteers	Legitimate Interest	<ul style="list-style-type: none"> <li>• Name, address, telephone number skills narrative</li> </ul>
	Event participant lists	Consent	<ul style="list-style-type: none"> <li>• Participant name and SWF Registration Number.</li> </ul>
Supplier administration	Contract	<ul style="list-style-type: none"> <li>• Supplier name, address, telephone number, email address.</li> </ul>	

## 1. Data protection principles

The Club is committed to processing data in accordance with its responsibilities under the GDPR.

Article 5 of the GDPR requires that personal data shall be:

- a. processed lawfully, fairly and in a transparent manner in relation to individuals;
- b. 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;
- c. adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
- d. 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;
- e. 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; and
- f. 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.”

## 2. General provisions

- a. This policy applies to all personal data processed by the Club.
- b. The Responsible Person shall take responsibility for the Club's ongoing compliance with this policy.
- c. This policy shall be reviewed at least annually.

## 3. Lawful, fair and transparent processing

- a. To ensure its processing of data is lawful, fair and transparent, the Club shall maintain a Register of Systems (as above)..
- b. The Register of Systems shall be reviewed at least annually.
- c. Individuals have the right to access their personal data and any such requests made to the Club shall be dealt with in a timely manner. Such Subject Access Requests shall only be made following a request in writing to the Responsible Person and verification of their identity. All requests shall be logged on receipt and a response given within 30 days.
- d. Under certain circumstances, Personal Data may be shared without the knowledge or consent of a Data Subject. Data may be shared with the Police, Revenue and Customs or Department of Work and Pensions for the following purposes:
  - a. the prevention or detection of crime
  - b. The apprehension or prosecution of offenders
  - c. The assessment or collection of a tax or duty
  - d. by the order of a court or by any rule of law

## 4. Lawful purposes

- a. All data processed by the Club must be done on one of the following lawful bases: consent, contract, legal obligation, vital interests, public task or legitimate interests ([see ICO guidance for more information](#)).
- b. The Club shall note the appropriate lawful basis in the Register of Systems.
- c. Where consent is relied upon as a lawful basis for processing data, evidence of opt-in consent shall be kept with the personal data.
- d. Where communications are sent to individuals based on their consent, the option for the individual to revoke their consent should be clearly available and systems should be in place to ensure such revocation is reflected accurately in the Club's systems.

## 5. Data minimisation

- a. The Club shall ensure that personal data are adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.

## 6. Accuracy

- a. The Club shall take reasonable steps to ensure personal data is accurate.
- b. Where necessary for the lawful basis on which data is processed, steps shall be put in place to ensure that personal data is kept up to date.
- c. Members (or their parent/carer) will be required to clearly document their personal data when registering themselves or their child.

## 7. Archiving / removal

- a. To ensure that personal data is kept for no longer than necessary, the Club shall put in place an archiving policy for each area in which personal data is processed and review this process annually.
- b. The archiving policy shall consider what data should/must be retained, for how long, and why.

## 8. Security

- a. The Club shall ensure that personal data is stored securely and is kept-up-to-date.
- b. Access to personal data shall be limited to personnel who need access and appropriate security should be in place to avoid unauthorised sharing of information.
- c. When personal data is deleted this should be done safely such that the data is irrecoverable.
- d. Appropriate back-up and disaster recovery solutions shall be in place.

## 9. Breach

In the event of a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data, the Club shall promptly assess the risk to people's rights and freedoms and if appropriate, implement a recovery plan and report this breach to the ICO and any affected data subject within 72 hours of discovery, if applicable ([more information on the ICO website](#)).

## 10. Your legal rights

You have various rights in relation to your personal information. These rights are as follows:

- **request access to your personal information** - you can request a copy of the personal information we hold on you;
- **request correction of your personal information** - if any personal information we hold on you is incorrect, you can request to have it corrected;
- **request erasure of your personal information** - you can ask us to delete your personal information in certain circumstances;
- **object to processing or restrict processing of your personal information** - you may object to our processing of your personal data in certain circumstances;
- **request the transfer of your personal information** - to provide you, or a third party you have chosen, with your personal information; and
- **withdraw consent where we're relying on consent to process your personal information** - if you withdraw your consent, we may not be able to provide certain products or services to you. We'll advise you if this is the case at the time you withdraw your consent.

To exercise your rights in relation to your personal information, please email the Club Secretary

## 11 Executive Committee Meetings

Data Protection and Security shall be a standing agenda items at Executive Committee Meetings. Should the Executive consider it necessary it shall conduct an audit of Data Protection compliance within the Club.

## **12. Compliance**

All club officials and employees shall be responsible for compliance with this policy and ensure that personal data is only held in the agreed ways within the club, the SWF Systems or on digital / paper team lines.

**The Executive Committee** shall be responsible for :

- Making decisions about how data is handled with sponsors & owners clearly identified.
- setting strategy and priorities around data,
- acting as a point of escalation for resolving data issues across the Club.
- ensuring that Data Protection and Security are standing agenda items at all meetings.

**Team Coaches** shall be responsible for helping drive Data Protection Principles and Policy, promoting privacy and data security; and sponsoring best practice throughout the club. They will:

- inspire all members of their team to accept data protection methods.
- support data protection processes within their respective teams.
- promote data protection.
- follow any processes and guidelines issued from the Committee.
- report potential data protection and security incidents and bad practices so that they can be addressed by the Committee e.g.
  - unsecure player data
  - sending player, coach, parent, committee data insecurely (such as not using the bcc option where appropriate)
  - collecting data with no approved form and statement (consent)

If you have any questions about this policy, please contact the Club Secretary.

END OF POLICY