

**Buckingham Town Cricket Club**

**Data Protection Policy**

**General Statement of Duties**

GDPR (General Data Protection Regulation) places certain obligations on sports clubs who process individual’s personal data. It regulates how personal information should be used and protects people from misuse of their personal details. Buckingham Town Cricket Club holds or uses information and therefore, 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.

Buckingham Town Cricket Club only collect personal data for “domestic or recreational reasons”. It is important that Buckingham Town Cricket Club still adhere to the principles of GDPR and understand best practice for managing information.

**1. Buckingham Town Cricket Club** **are committed to:**

* Ensuring that we comply with GDPR principals best we can, as listed below (section 2)
* Meeting our legal obligations as laid down by GDPR 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 officer is responsible for data protection compliance and provides a point of contact for all data protection issues (The Secretary)
* Ensuring that all club officers are made aware of good practice in data protection
* Ensuring that everyone handling personal data knows where to find further guidance
* Ensuring that queries about data protection, internal and external to the organisation, are dealt with effectively and promptly
* Regularly reviewing data protection procedures and guidelines within the club

**2. General Data Regulation Principals**

* Personal data shall be processed fairly and lawfully
* Personal data shall be obtained for one or more specified and lawful purposes, and shall not be further processed in any manner incompatible with that purpose or those purposes
* Personal data shall be adequate, relevant and not excessive in relation to the purpose or purposes for which they are processed
* Personal data shall be accurate and, where necessary, kept up to date
* Personal data processed for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes
* Personal data shall be processed in accordance with the rights of data subjects under the GDPR Act May 2018
* Appropriate technical and organisational measures shall be taken against unauthorised and unlawful processing of personal data and against accidental loss or destruction of, or damage to, personal data
* 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

**3. Data Protection Statement and Security**

* All Club Registration/Application forms and Coaches/Managers Details forms contain our data protection statement:

***Buckingham Town Cricket Club take the protection of the data that we hold about you as a member seriously and will ensure that the data you provide is processed in accordance with data protection legislation.***

***Please read the full privacy notice carefully, available on our website, to see how the Club will treat the personal information that you provide to us.***

* All Club Databases and documents containing personal information will be Password Protected.
* Those Officers and Members of the Club responsible for keeping personal data will be duly trained in appropriate security measures in order to keep the data secure.
* Passwords use by these Officers and Members of the Club responsible for keeping personal data will be changed on a regular basis.
* Passwords will not be concurrent e.g. 1234, pppp, abcd. Neither will they be transposed from change to change e.g. subtle21 to subtle22 and back
* Passwords will be at least eight digits long and contain a mixture of letters, numbers and special characters e.g. ! & \*.
* All such Club Databases and documents will be administered by a nominated Club Official. Such Club Official will log all instances where he/she releases such Database or Document to other Committee Members or Club Officials whether that be by electronic transmission or hard copy. The entry in the log will specify 'date', 'time', 'person that the data is released to' and the 'reason for the release' and the up-to-date log will be forwarded to the Chairman at regular intervals by the relevant Club Official.
* All emails sent by Buckingham Town Cricket Club Officials will contain the following ‘disclaimer’:

***This email and any attachments are confidential and may also be privileged. If you have received it in error, you are on notice of its status. It is intended solely for the addressee. If you are not the intended recipient, please notify the sender immediately and delete all copies of the email on your systems and any attachments. Any unauthorised use is strictly prohibited. You must not otherwise use, disclose, distribute, copy, print or rely on this email. Any view expressed in this email which does not relate to the official business of Buckingham Town Cricket Club, is neither given or endorsed by Buckingham Town Cricket Club. To the fullest extent of the law, Buckingham Town Cricket Club accepts no liability for unauthorised use of this email.***

* All computers that are utilised by Buckingham Town Cricket Club Officials holding such Club Databases and documents will have recognised Anti Virus software installed.

**4. Rights of Access**

Individuals have a right of access to personal information about them which is held by Buckingham Town Cricket Club. Any individual wishing to access their personal data should put their request in writing to the Secretary. Buckingham Town Cricket Club will endeavour to respond to any such written request as soon as is reasonably practicable and in any event, within 40 days.

You should be aware that certain data is exempt from the right of access under GDPR; this may include information which identifies other individuals, information which Buckingham Town Cricket Club reasonably believes is likely to cause damage or distress, or information which is subject to legal professional privilege.

**5. Exemptions**

There are situations where access to information may be withheld by Buckingham Town Cricket Club:

1. The GDPR Act contains a number of exemptions when information may be withheld. For Buckingham Town Cricket Club purposes these include:

* information which might cause serious harm to the physical or mental health of a child or another individual;
* cases where the disclosure would reveal a child is at risk of abuse

b) Unstructured personal information.

Buckingham Town Cricket Club will generally not be required to provide access to information held mutually and in an unstructured way.

**6. Monitoring and Review**

This policy will be monitored by the Secretary and will be reviewed annually or at any time when changes to other policies or legislation may affect this current policy.