



# Privacy Policy

(created September 2020)

## 1. GENERAL

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- 1.1 **Brandon Netball Club** is committed to ensuring that personal information is held fairly, lawfully and securely in accordance with data protection laws.
- 1.2 This policy covers the different elements of personal information we collect from you, what we do with the information, how long we will hold it, what we won't do with the information, as well as what rights you have.

## 2. INTRODUCTION TO DATA PROTECTION

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- 2.1 We have an obligation under Regulation (EU) 2016/679 of the European Parliament – the General Data Protection Regulation ('GDPR') to provide you with information about how and why we use your data. We recognise our obligations and your legal rights set out in the GDPR. We are committed to protecting and respecting your privacy by complying with the principles of the GDPR.

## 3. WHO ARE 'WE'?

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- 3.1 In this policy, whenever you see the words 'we', 'us' or 'our', it refers to **Brandon Netball Club**. We are a netball Club responsible for delivery of netball activities for our club members. Brandon Netball Club is the controller of all personal data processed by **Brandon Netball Club**.

## 4. DATA PROTECTION OFFICER

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- 4.1 **Brandon Netball Club** does not have a Data Protection Officer. However, for information and queries about data protection compliance, email: [brandonnetball@gmail.com](mailto:brandonnetball@gmail.com).

## 5. AMENDMENTS TO OUR PRIVACY POLICY

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- 5.1 If we amend our privacy policy, any changes will be circulated to members by email and placed on the Club's Facebook group page. If necessary, this will be brought to your attention.
- 5.2 This policy was last updated on: \*\* September 2020.

## 6. WHAT IS PERSONAL DATA?

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- 6.1 'Personal data' means any information relating to a living individual ('data subject') who can be identified, directly or indirectly by the information.

## 7. THE TYPES OF PERSONAL DATA WE MAY COLLECT

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- 7.1 The data we collect about you will vary, depending on our relationship with you. Below are examples of the sorts of data that we may collect:
- Full name and personal details (e.g. photograph, driving licence);
  - Contact information (e.g. home address, email address, telephone numbers);
  - Date of birth and/or age;
  - Special categories of data such as medical history or disability;
  - Next of kin and emergency contact information;
  - Imagery in video and/or photographic form and voice recordings;
  - Records of participation at events/sessions/competition;
  - Records of enquiries and other correspondence with you; and
  - Suppliers, sponsors and client lists.

## 8. HOW WE USE YOUR PERSONAL INFORMATION

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- 8.1 We collect, store and process personal data for several purposes, mainly: mainly Club membership; event and competition management. We will not use any of the information that we collect from you, or about you, for any purpose other than those listed in this document or for purposes that are similar. If we would like to use your personal data in any other way, we will present you with relevant information at the point at which one of these additional purposes arises.
- 8.2 The GDPR provides that legally we might hold and process your information for any of the following four reasons and we have included below a summary of what that means for **Brandon Netball Club** and how we might use information you provide to us:

*Where required to perform a **CONTRACT**. For example:*

- To administer and manage our relationship with members / participants.
- To administer our relationship with people attending our Club and to send them information about the Club e.g. training times, match details etc.
- To administer attendance at competitions, events or training.
- To fulfil our contractual relationship with clients, sponsors and suppliers.

*Where required to comply with our **LEGAL OBLIGATIONS**. For example:*

- To comply with health and safety requirements. For example, to ensure the safe running of netball sessions and to enable adaptations as required.
- To ensure we are offering equitable access to netball activities to avoid discrimination.
- For the prevention of fraud and other criminal activities.

*Where there is a **LEGITIMATE INTEREST**. For example:"*

- To correspond and to answer queries and complaints.
- To create a better understanding of players and supporters including the processing of personal data for the purpose of research.
- To arrange for any trips or transportation of officials, athletes of volunteers to events.
- To ensure understanding of the coaching, officiating and volunteering workforce available.

- To comply with awards bodies' accreditation obligations.
- To administer and monitor attendance at events and competitions.

Where you have provided **CONSENT**. For example:

We may use and process your personal information where you have **consented** for us to do so for the following purposes:

- Promoting our sponsors' or partners' services.
- Marketing.

## 9. RETAINING YOUR INFORMATION

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- 9.1 If we collect your personal information, the length of time that we retain it is determined by a number of factors, including the purpose for which we use that information and to comply with our other legal obligations (apart from GDPR). We maintain a Retention Schedule, which records approved retention periods, the reasoning for the retention period and end of life treatment. Some of these retention periods are currently being defined and an update of this privacy policy will be undertaken once they have been formally approved.
- 9.2 We do not retain personal information in an identifiable format for longer than is necessary. Where you have consented for us to retain your data, we will only hold the data for the duration of your consent.

## 10. CHILDREN

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- 10.1 We do not collect or process children's data (individuals under the age of 14).

## 11. USING YOUR INFORMATION FOR MARKETING

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- 11.1 We only send marketing information to you if you have explicitly agreed to our doing so or have requested it and we will only do so in the way(s) you have agreed to. You can withdraw consent at any time. See below for more information.
- 11.2 Marketing information covers information about tickets to events, special offers, opportunities, products and services and other commercial information.
- 11.3 In connection with information about tickets, special offers, opportunities, products and services and other commercial information, the categories have been divided into two groups:
- from England Netball, Avon Netball Association and Brandon Netball Club
  - from England Netball, Avon Netball Association and Brandon Netball Club about its sponsors and partners.
- 11.4 If you want to receive information from either of these two groups but haven't yet requested it, you can do so by sending an email to the Club - [brandonnetball@gmail.com](mailto:brandonnetball@gmail.com) - with the subject line 'Marketing Emails Request).

## 12. WITHDRAWING CONSENT

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- 12.1 If we contact you and you want to change how – or if – you receive our communications, please email [brandonnetball@gmail.com](mailto:brandonnetball@gmail.com) with the subject line ‘Withdrawing Consent’.

## 13. SHARING YOUR PERSONAL DATA AND DATA PROCESSING

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- 13.1 We only share personal data where we are required by law or with our suppliers or sub-contractors who carry out work for us and who you have given us permission to share it with. Other than the circumstances set out above, information about you will not be passed to a third party for any other purposes. All our suppliers and sub-contractors are required by their own data sharing agreements or contracts to treat your data as carefully as we would, to use it only as instructed, and to allow us to check that they do this.
- 13.2 Organisations we may share your personal data with
- All England Netball Association
  - Avon Netball Association

## 14. PROFILING

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- 14.1 **Brandon Netball Club** does not perform any profiling that has legal or significant effect nor any automated decision making.

## 15. INTERNATIONAL TRANSFER

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- 15.1 The personal information we collect may be transferred to and stored in countries outside of the UK and the European Union. Some of these jurisdictions require different levels of protection in respect of personal information and, in certain instances, the laws in those countries may be less protective than the jurisdiction you are resident. We will take all reasonable steps to ensure that your personal information is used only in accordance with this privacy notice and applicable data protection laws and is respected and kept secure. Where a third party processes your data on our behalf, we will put in place appropriate safeguards as required under data protection laws.
- 15.2 International organisations we work with:
- **WhatsApp** – WhatsApp is free messaging and calling service, available on phones worldwide. In the European Economic Area (which includes the European Union) services are provided by WhatsApp Ireland Limited (“WhatsApp Ireland”) which is also the data controller responsible for your information when you use their services. Information on WhatsApp’s privacy policy, including the way in which the organisation uses and protects your information can be found at <https://www.whatsapp.com/legal/#privacy-policy>
  - **Dropbox** – Dropbox is a web-based file storage and sharing platform based in the USA which is not recognized by the European Commission as a country having data protection, and privacy laws equivalent to those we enjoy as European citizens. Dropbox subscribes to the EU-US Privacy Shield, which is approved by the EU in relation data protection practices. The Dropbox registration on the Privacy Shield is

available to review on the Privacy Shield website. Dropbox’s privacy information can be found at <https://www.dropbox.com/privacy>

- **Gmail** – Gmail is a web-based free email platform, operated by Google, with servers based worldwide. Google complies with certain legal frameworks relating to the transfer of data, such as the EU-US Privacy Shield framework. Google’s privacy information can be found at <https://policies.google.com>

## 16. INFORMATION SECURITY

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16.1 We do our very best to keep personal information secure wherever we collect personal data online. We place a great importance on the security of all personally identifiable information associated with our members and supporters. We will take all steps reasonably necessary including policies, procedures and security features to ensure that information about you is treated securely and protected from unauthorised and unlawful access and used in accordance with this privacy policy. We have security measures in place to attempt to protect against the loss, misuse and alteration of personal data under our control or being transferred, we use our best efforts to try to prevent this.

## 17. WHAT WE DON’T DO WITH YOUR INFORMATION

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17.1 We never sell or share your information with other organisations to use for their own purposes.

## 18. YOUR RIGHTS

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18.1 The GDPR grants you certain rights (‘information rights’) which we summarise below.

Right of access	You have the right to obtain confirmation from <b>Brandon Netball Club</b> as to whether or not personal data concerning you are being processed, and, where that is the case, you have the right to access that personal data.
Right to rectification	You have the right to oblige <b>Brandon Netball Club</b> to rectify inaccurate personal data concerning you. Taking into account the purposes of the processing, you have the right to have incomplete personal data completed by providing a supplementary statement.
Right to erasure (right to be forgotten)	You have the right (under certain circumstances, but not all) to oblige <b>Brandon Netball Club</b> to erase personal data concerning you.
Right to restriction of processing	You have the right (under certain circumstances, but not all) to oblige <b>Brandon Netball Club</b> to restrict processing of your personal data. For example, you may request this if you are contesting the accuracy of personal data held about you.
Right to data portability	You have the right (under certain circumstances, but not all) to oblige <b>Brandon Netball Club</b> to provide you with the personal data about you which you have provided to <b>Brandon Netball Club</b> in a structured, commonly used and machine-readable format. You also have the right to oblige <b>Brandon Netball Club</b> to transmit the data to another controller.
Right to withdraw consent	If the lawful basis for processing is consent, you have the right to withdraw that consent.

Right to object to direct marketing	Where your personal data are processed for direct marketing purposes, you have the right to object at any time to processing of your personal data for marketing, which includes profiling to the extent that it is related to such direct marketing.
Rights in relation to automated decision making and profiling	<b>Brandon Netball Club</b> does not perform any automated decision-making based on personal data that produces legal effects or similarly significantly affects you.

## 19. YOUR RIGHT TO LODGE A COMPLAINT WITH A SUPERVISORY AUTHORITY

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- 19.1 If you wish to exercise any of your rights concerning your personal data, you should contact us at [brandonnetball@gmail.com](mailto:brandonnetball@gmail.com).
- 19.2 **Brandon Netball Club** is not a 'public authority' as defined under the Freedom of Information Act and we will not therefore respond to requests for information made under this Act.
- 19.3 If you are not satisfied with the response you receive, you have the right to lodge a complaint with the supervisory authority. In the United Kingdom this is the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF, telephone: 0303 123 1113, email: [casework@ico.org.uk](mailto:casework@ico.org.uk).