



## **Holt Netball Club Privacy Policy**

Holt Netball Club is committed to ensuring that personal information is held fairly, lawfully and securely in accordance with data protection laws.

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.

### **Introduction to Data Protection**

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.

### **Who are 'we'?**

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

### **Data Protection Officer**

Holt Netball Club does not currently have a Data Protection Officer. However, for information and queries about data protection compliance, email: [holtnetballclub@gmail.com](mailto:holtnetballclub@gmail.com)

### **Amendments to our Privacy Policy**

If we amend our privacy policy, any changes will be published on our website. If necessary, this will be brought to your attention.

This policy was last updated on 02 June 2019.

### **What is personal data?**

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

### **The types of personal data we may collect**

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;
- 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 race or ethnicity, disability or sexual orientation;
- 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;

## How we use your personal information

We collect, store and process personal data for several purposes, mainly: our membership administration, event and competition management and netball participation purposes. 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.

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 Holt 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 club members and to send you information about the club e.g. training times, match cancellation etc.
- To administer attendance at competitions, events or training
- To fulfil our contractual relationship with club members

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

- To comply with health and safety requirements.
- To ensure the safe running of netball sessions and to enable adaptations as required
- To comply with safeguarding requirements e.g. working with children or vulnerable adults
- To ensure we are offering equitable access to your services 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 from members, leagues and affiliations
- To create a better understanding of players and supporters, and process personal data for the purposes of research
- To arrange for any trips or transportation of officials, athletes or volunteers to events
- To ensure understanding of the coaching, officiating and volunteering workforce available
- To comply with awarding bodies' accreditation obligations
- To comply with Moonraker and League obligations
- To administer and monitor attendance at events and competition
- To administer membership with Holt Netball Club and all administrative aspects of being a member of the club

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 the netball, our events and opportunities
- Promoting our partners' services

## Retaining your information

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 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. For the majority of membership data, this means we will retain it for as long as you have a valid club membership and for a period of 1 year after your last interaction with the club.

We will hold information about you in our data systems only for as long as we need it for the purpose for which we collected it, which is as follows:

- As long as members continue to engage with or use our services (including engaging with emails, attending training sessions, entering events) we will retain and process information about you. In such cases, you will be considered to be an 'active' member. If you have not been 'active' as a member for a period of 1 year, we will anonymise any personal data relating to you
- Any data relating to the obligations of attending events or training sessions to maintain a comprehensive, published index of results and attendance will be retained. This would not include more than name and age category, alongside details of the event in which an individual took part
- Personal data linked to the processing of insurance claims, subject access requests, disputes, safeguarding investigations or police matters will only be kept for as long as it necessary for those purposes, as each is applicable

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.

## **Children**

Children's data are collected and processed in accordance with the information below. Parents and guardians are expected to ensure that the children they are responsible for are aware of how their personal data will be processed by us.

We require parental or guardian consent to process personal data of any child under the age of 14.

## **Using your information for marketing**

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.

Marketing information covers information about tickets to events, special offers, opportunities, products and services and other commercial information which we think you may be interested in.

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 Holt Netball Club
- from Holt Netball Club about its partners, Leagues, other clubs

If you want to receive information from either of these two groups but haven't yet requested it, you can do so by [holtnetballclub@gmail.com](mailto:holtnetballclub@gmail.com)

## **Withdrawing consent**

If you want to withdraw consent or change how or if you receive our communications, please email [holtnetballclub@gmail.com](mailto:holtnetballclub@gmail.com)

## **Sharing your personal data and data processing**

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.

Organisations we share your personal data with

- All England Netball Association
- County Netball Associations
- Regional Netball Associations
- Leagues such as Moonraker league
- Affiliated/England Netball members netball clubs
- Other persons who help us to provide training
- Where the law requires it. We may disclose your personal information to third parties if we are under a duty to comply with any legal obligation; to enforce or apply our terms of use and other agreements; or to protect the rights, property, or safety of FNC members, or others
- Anyone else where we have your consent

## **Profiling**

Holt Netball Club does not perform any profiling that has legal or significant effect nor any automated decision making.

## **International transfer**

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.

We currently do not work with any international organisations.

## **Information Security**

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, supporters, customers and users. 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.

Our website, communications and social media sites may, from time to time, contain links to and from the websites of third parties. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not expect any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

## **What we don't do with your information**

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

## **Your rights**

The GDPR grants you certain rights ('information rights') which we summarise below.

Right of access	You have the right to obtain confirmation from Holt Netball Club 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 Holt Netball Club 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 Holt Netball Club to erase personal data concerning you.
Right to restriction of processing	You have the right (under certain circumstances, but not all) to oblige Holt Netball Club 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 Holt Netball Club to provide you with the personal data about you which you have provided to Holt Netball Club in a structured, commonly used and machine-readable format.  You also have the right to oblige Holt Netball Club 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	Holt Netball Club does not perform any automated decision-making based on personal data that produces legal effects or similarly significantly affects you.

## Your right to lodge a complaint with a supervisory authority

If you wish to exercise any of your rights concerning your personal data, you should contact us at [holtnetballclub@gmail.com](mailto:holtnetballclub@gmail.com).

The Holt 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.

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