**Data Protection Policy**

1. About this Policy
   1. Bleak Hill Rovers handles personal data about current, former, and on occasion prospective players and their parents or guardians, volunteers, committee members, referees, coaches, managers, contractors, third parties, suppliers, and any other individuals that we communicate with.
   2. In our official capacity with the County FA, we may process personal data on their behalf and they may process personal data about us. We recognise the need to treat all personal data in an appropriate and lawful manner, in accordance with the EU General Data Protection Regulation 2016/679 (**GDPR**).
   3. Correct and lawful treatment of this data will maintain confidence in the Club / County FA / League, and protect the rights of players and any other individuals associated with the Club. This Policy sets out our data protection responsibilities and highlights the obligations of the Club, which means the obligations of our committees, volunteers, members, and any other contractor or legal or natural individual or organisation acting for or on behalf of the Club..
   4. The Club Executive Committee will be responsible for ensuring compliance with this Policy. Any questions about this Policy or data protection concerns should be referred to the chairman of the committee.
   5. We process volunteer, member, referee, coach, manager, contractor, committee, supplier and third party personal data for administrative and Club management purposes. Our purpose for holding this personal data is to be able to contact relevant individuals on Club, League or FA business and our legal basis for processing your personal data in this way is the contractual relationship we have with you. We will keep this data for 24 months after the end of your official relationship with the Club, unless required otherwise by law and / or regulatory requirements.
   6. All the key definitions under GDPR can be found [here](https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/key-definitions/).
2. What we need from you
   1. We have set out the key guidance in this section but please do read the full policy carefully.
   2. Please help us to comply with the data protection principles (set out briefly in section 3 of this policy and in further detail below):
      1. We will ensure that we only process data in accordance with transparent processing.
      2. We will only process personal data for the purposes for which we have collected it
      3. If we are asked to correct an individual’s personal data, we will make every effort to ensure that we can identify that individual and, where we have been able to identify them, make the relevant updates on our records and systems;
      4. We will treat all personal data as confidential. It is stored in electronic format and the personal computer is password protected and the number of people who have access to the information is limited. Some information will be stored in hard copy format which is locked away safely and is not kept in a car overnight or disposed of in a public place;
      5. if we receive a subject access request (or we think somebody is making a subject access request for access to the information we hold on them) then we may seek the advice of the FA to ensure we meet the required deadlines.
3. Data protection principles
   1. Anyone processing personal data must comply with the enforceable principles of data protection. Personal data must be:
      1. processed lawfully, fairly and in a transparent manner;
      2. collected for only specified, explicit and legitimate purposes;
      3. adequate, relevant and limited to what is necessary for the purpose(s) for which it is processed;
      4. accurate and, where necessary, kept up to date;
      5. kept in a form which permits identification of individuals for no longer than is necessary for the purpose(s) for which it is processed;
      6. processed in a manner that ensures its security by appropriate technical and organisational measures to protect against unauthorised or unlawful processing and against accidental loss, destruction or damage;
   2. We are responsible for and must be able to demonstrate compliance with the data protection principles listed above.
4. Fair and lawful processing
   1. This Policy aims to ensure that our data processing is done fairly and without adversely affecting the rights of the individual.
   2. Lawful processing means data must be processed on one of the legal bases set out in the GDPR. When special category personal data is being processed, additional conditions must be met.
5. Processing for limited purposes
   1. The Club collects and processes personal data. This is data we receive directly from an individual and data we may receive from other sources.
   2. We will only process personal data for the purposes of the Club / County FA / League as instructed by the committee, the League,the County FA or The FA, or as specifically permitted by the GDPR. We will let individuals know what those purposes are when we first collect the data or as soon as possible thereafter.
6. Consent
   1. One of the lawful bases on which we may be processing data is the individual’s consent.
   2. An individual consents to us processing their personal data if they clearly indicate specific and informed agreement, either by a statement or positive action.
   3. Individuals must be easily able to withdraw their consent at any time and withdrawal must be promptly honoured. We will refresh consents each season.
   4. Explicit consent is usually required for automated decision-making and for cross-border data transfers, and for processing special category personal data. Where children are involved then the consent must be in writing from parent/guardian
   5. Where consent is our legal basis for processing, we will need to keep records of when and how this consent was captured.
   6. Our Privacy Notice sets out the lawful bases on which we process data of our players and members.
7. Notifying individuals
   1. Where we collect personal data directly from individuals, we will inform them about:
      1. the purpose(s) for which we intend to process that personal data;
      2. the legal basis on which we are processing that personal data;
      3. where that legal basis is a legitimate interest, what that legitimate interest is;
      4. where that legal basis is statutory or contractual, any possible consequences of failing to provide that personal data;
      5. the types of third parties, if any, with which we will share that personal data, including any international data transfers;
      6. their rights as data subjects, and how they can limit our use of their personal data;
      7. the period for which data will be stored and how that period is determined;
      8. any automated decision-making processing of that data and whether the data may be used for any further processing, and what that further processing is.
   2. If we receive personal data about an individual from other sources, we will provide the above information as soon as possible and let them know the source we received their personal data from;
8. Adequate, relevant and non-excessive processing
   1. We will only collect personal data that is required for the specific purpose notified to the individual.
   2. We will only process personal data if required to do so in our official capacity with the Club / County FA / League We will process personal data for any reason unrelated to our duties.
   3. The Club / County FA / League will ensure that when personal data is no longer needed for specified purposes, it is deleted or anonymised.
9. Accurate data

We will ensure that personal data we hold is accurate and kept up to date. We will check the accuracy of any personal data at the point of collection and at the start of each season. We will take all reasonable steps to destroy or amend inaccurate or out-of-date data.

1. Timely processing

We will not keep personal data longer than is necessary for the purpose(s) for which they were collected. We will take all reasonable steps to destroy or delete data which is no longer required, as per our Privacy Notice.

1. Processing in line with data subjects’ rights
   1. As data subjects, all individuals have the right to:
      1. be informed of what personal data is being processed;
      2. request access to any data held about them by a data controller;
      3. object to processing of their data for direct-marketing purposes (including profiling);
      4. ask to have inaccurate or incomplete data rectified;
      5. be forgotten (deletion or removal of personal data);
      6. restrict processing;
      7. data portability; and
      8. not be subject to a decision which is based on automated processing.
   2. The Club is aware that not all individuals’ rights are absolute, and any requests regarding the above will be immediately reported to the committee, and if applicable escalated to the County FA for guidance.
2. Data security
   1. We will take appropriate security measures against unlawful or unauthorised processing of personal data, and against the accidental loss of, or damage to, personal data.
   2. We have proportionate procedures and technology to maintain the security of all personal data.
   3. Personal data will only be transferred to another party to process on our behalf (a **data processor**) where we have a GDPR-compliant written contract in place with that data processor.
   4. We will maintain data security by protecting the confidentiality, integrity and availability of the personal data.
3. Disclosure and sharing of personal information
   1. We share personal data with the County FA/ and The FA, and with applicable leagues using Whole Game System.
   2. We may share personal data with third parties or suppliers for the services they provide, and instruct them to process our personal data on our behalf as data processors. Where we share data with third parties, we will ensure we have a compliant written contract in place incorporating the minimum data processer terms as set out in the GDPR, which may be in the form of a supplier’s terms of service.
   3. We may share personal data we hold if we are under a duty to disclose or share an individual’s personal data in order to comply with any legal obligation, or in order to enforce or apply any contract with the individual or other agreements; or to protect our rights, property, or safety of players or other individuals associated with the Club or.
4. Reporting a personal data breach
   1. In the case of a breach of personal data, we may need to notify the applicable regulatory body and the individual.
5. Dealing with subject access requests
   1. Individuals may make a formal request for information we hold about them. Anyone who receives such a request should forward it to the committee immediately, and where necessary escalated to the County FA for guidance. Nobody should feel bullied or pressured into disclosing personal information.
   2. When receiving telephone enquiries, we will only disclose personal data if we have checked the caller's identity to make sure they are entitled to it.
6. Accountability
   1. The Club has implemented appropriate technical and organisational measures to look after personal data, and is responsible for, and must be able to demonstrate compliance with the data protection principles.
   2. The Club has adequate resources and controls in place to ensure and to document GDPR compliance, such as:
      1. providing fair processing notice to individuals at all points of data capture;
      2. training committee and volunteers on the GDPR, and this Data Protection Policy; and
      3. reviewing the privacy measures implemented by the Club or FA
7. Changes to this policy

We reserve the right to change this policy at any time. Where appropriate, we will notify you by email.

24 April 2018