Whitehead Sport and Social Club Privacy Policy
This sets out our data protection policy and how we manage your personal information.

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About our policy
This policy with our privacy notices explain how we collect and manage your personal data as a member or user of our club, under the:
- UK General Data Protection Regulation (UK GDPR)
- Data Protection Act (DPA) 2018

Data protection statement
By ‘personal information’ or ‘personal data’, we mean any information that can identify you as a person. It does not include data where you cannot be identified (anonymous data).

We’re committed to protecting the privacy and security of your personal information. As a data controller we’re responsible for deciding why and how we hold and use personal information about you.

This policy along with our privacy notices describe how we collect and use personal information, such as:
- for managing membership
- for marketing our facilities, services and events
- we collect from CCTV
- we collect from social media interaction, or saved as files (known as ‘cookies’) from our online services

Data protection legislation requires us to let you know about the information contained in our privacy notices. You can read any notices that apply to you, so you know how and why we're using your information.

Data protection principles
We'll always comply with data protection law. Personal information we hold about you must be:

- used lawfully, fairly and in a transparent way
- collected only for valid purposes that we've clearly explained to you and not used in any way that is incompatible with those purposes
- adequate, relevant and limited to what's needed for the purpose of the processing
- accurate and kept up to date
- kept in a form that identifies you for only as long as needed for the purposes we've told you about
- kept securely

We need all the categories of information mentioned in this policy for us to provide membership and our services. But we'll only collect and use your personal data when we need to, and we will never share your data with a third party unless bound by law, for the prevention of crime, or for the safety of a club user. We will never sell your data.

Information we hold
We process data about:

- club members in managing the membership system
- contact details for marketing our facilities, services and events
- complainants and enquirers
- interactions with our social media and website
- job applicants and staff

Depending on the reason for our processing, we may collect, store and use specific categories of information about you. This includes:

- your contact details, such as title, name, age, email addresses and phone numbers
- relationships with other members, for example in recording a family membership
- tracking and monitoring data, for example, cookies or social media interactions, when you use our online services or social media
- bank details to pay our suppliers and staff

Collecting personal information
We collect personal information directly from you, such as when:

- you or a family member makes an application to become a member of the club or to make a booking for our services
- you contact us and correspond with us
- you use our facilities and are recorded by CCTV

Using personal information
We'll only use your personal information when the law allows us to.
Most commonly, we'll use your personal information where needed:

- to record your membership
- to contact you with details of our facilities, services or events
- to check that data we hold about you is accurate and up to date, or following a request from you
- to help us confirm your membership status when you make a purchase, or to check your entitlement to any discounts we offer
- indirectly via CCTV as you use our facilities
- to produce statistics, or to conduct analysis which helps us to improve our services, although we'll never share details about an individual
- to comply with a legal obligation

We may sometimes ask you for consent to use your personal information. But where your consent is required, we will make it explicit when we collect the information and you have rights to opt out of those uses, for example marketing our events.

Sharing data
We will never share your data with any third party third party unless bound by law, for the prevention of crime, or for the safety of a club.

If we do share data, we will ensure only the data that is necessary is shared, and that the data are shared via a secure means.

We will never sell your data.

Storage and disposal of data
We store all your personal information in a secure Microsoft Cloud service, hosted in the UK and will not transfer it outside the UK. When you complete an online form, data will be transferred securely into this service. If you complete a paper form, the information will be transferred into the system and the paper copy destroyed.

We take security of your data seriously and club directors and staff are regularly reminded of their obligations. We also limit access to your personal information to those who have a business or legal need to do so, or have access authorised by you.

There are procedures in place to deal with any suspected data security breach. We'll notify you and the regulator of a suspected breach where we're legally required to do so.

We keep your personal information for only for as long as it's needed for the purposes why we're using it. However, most data for lapsed members will be removed after 2 years of their membership lapsing, although we will keep a note of your name and date of deletion alongside the empty record, as evidence we have removed your data. We will periodically clear our bookings database in respect of past events.

CCTV data will be held for a maximum of 30 days before being overwritten on a continuous loop. We also have a separate CCTV policy (add link).

Contacts and complaints
Our Data Protection Officer oversees compliance with data protection obligations. For any questions about this policy, related privacy notices, or how we handle your information, contact our Data Protection Officer. Complaints about how we handle your information should also be directed to our Data Protection and GDPR Officer in the first instance:
GDPROfficer@whiteheadclub.co.uk

You can also complain directly to the Information Commissioner's Office (ICO) about how we handle your information. The ICO is the UK supervisory authority for data protection issues.

Complaints not relating to how we handle your information should be addressed to the club secretary (secretary@whiteheadclub.co.uk) and should follow our general complaints procedure (add link)

Our privacy notices
Please read privacy notice to see your rights for (add link).

Rights of access to information
Under the Data Protection Act 2018 any individual has the right to make a request to access the personal information held about them. These procedures relate to subject access requests made under the Data Protection Act 2018.

Requests for information must be made in writing; which includes email, and be addressed to the club secretary (secretary@whiteheadclub.co.uk). If the initial request does not clearly identify the information required, then further enquiries will be made.

The identity of the requestor must be established before the disclosure of any information, and checks should also be carried out regarding proof of relationship if the subject is a child. Evidence of identity can be established by requesting production of:

- passport
- driving licence
- utility bills with the current address
- birth / marriage certificate
- P45/P60
- credit card or mortgage statement

This list is not exhaustive.

There are a number of points that should be considered in making a request.

- Any individual has the right of access to information held about them. However, with children, this is dependent upon their capacity to understand (normally age 12 or above) and the nature of the request. The Managing Director should discuss the request with the child, along with their Parent/Guardian and take their

views into account when making a decision. A child with competency to understand can refuse to consent to the request for their records. Where the child is not deemed to be competent an individual with parental responsibility or guardian shall make the decision on behalf of the child.

- The club may make a charge for the provision of information, dependent upon the number of pages provided. This may be disciplinary notes for example.
- The response time for subject access requests, once officially received, is 40 days **(not working days but calendar days, irrespective of holiday periods)**. However, the 40 days will not commence until after receipt of fees or clarification of information sought.
- The Data Protection Act 2018 allows exemptions as to the provision of some information; **therefore, all information will be reviewed prior to disclosure**.
- Third party information is that which has been provided by another, such as the police or local authority. Before disclosing third party information consent should normally be obtained. There is still a need to adhere to the 40-day statutory timescale.
- If there are concerns over the disclosure of information then additional advice should be sought from the ICO.
- Where redaction (information blacked out/removed) has taken place then a full copy of the information provided should be retained in order to establish, if a complaint is made, what was redacted and why.
- Information disclosed should be clear, thus any codes or technical terms will need to be clarified and explained. If information contained within the disclosure is difficult to read or illegible, then it should be retyped.
- Information can be provided at the club with a member of the Board on hand to help and explain matters if requested, or provided at face-to-face handover.
- The views of the applicant should be taken into account when considering the method of delivery. If postal systems have to be used then registered/recorded mail must be used.

Other rights

Any individual has the right to erasure or correction of information held by the club, or a right to withdraw consent previously given for certain processing activities.

Where we are made aware of an error in the data we hold, we will correct the data as soon as possible.

Where a request is made to erase data, this will be actioned as soon as possible provided the data items to be erased don't compromise the ability to manage the membership record. This includes removal of consent for marketing.

Where a request is made to erase data that impact our ability to manage membership, then it should be noted that this will end membership. This can be actioned immediately or postponed until the end of the membership period. We will retain a name and date of erasure as evidence of that erasure. No refund for unused membership time will be given.

Data breaches

When a data breach or loss occurs (for example personal data are inadvertently shared with an unauthorised person), the club follows a specific policy (add link).