**Crossbow Netball Club**

**Privacy Policy**

Crossbow 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 Crossbow Netball Club. We are the club responsible for delivery of netball activities for our club members. Crossbow Netball is the controller of all personal data processed by Crossbow Netball.

**Data Protection Officer**

Crossbow Netball Club does not have a Data Protection Officer. However, for information and queries about data protection compliance, email our Data Protection Lead: Naomi Colton at naomilerway@hotmail.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: 15/07/2020

**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 and 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;

**How we use your personal information**

We collect, store and process personal data for several purposes, mainly: membership to Crossbow Netball Club and Affiliation to England Netball. 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 Crossbow Netball and how we might use information you provide to us:

Where required to perform a **CONTRACT**.

Players signing up to play for Crossbow Netball Club are entering a contract to play netball for Crossbow Netball Club and compete within the leagues that we enter. We collect data in order to fulfil that contract. Collection of data enables us to:

* 1. Administer and manage our relationship with our members/participants.
  2. Send members information about the club e.g. training times, match cancellations etc.
  3. Set up appropriate affiliation packages for members to choose from on the MyNet site and administer attendance at training, events and matches.

Where required to comply with our **LEGAL OBLIGATIONS,** data collection enables us to:

1. Ensure we meet all health and safety requirements. For example to ensure the safe running of netball sessions and make any adaptations as required.
2. Ensure we comply with all safeguarding requirements of members under 18 and any vulnerable adult members.
3. Ensure we offer equitable access to our services to avoid discrimination.

Where there is a **LEGITIMATE INTEREST.** As a club we have a legitimate interest in our players information so that we can provide the best possible experience for our members and run our club as efficiently as possible. Data collection enables us to:

1. Correspond with our members and answer any queries/complaints.
2. Understand our players better.
3. Organise trips or arrange transportation to events for our members/coaches.
4. Understand the coaching, volunteering and officiating workforce that we have available to us.
5. Comply with awarding bodies accreditation obligations.
6. Administer and monitor attendance at training, events and matches.

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

1. We may take photos or videos for marketing/promotional purposes on our website or other social media platforms.
2. Provide occasional netball related information on upcoming events and product offers to our members via email.

**Retaining your information**

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:

For the entirety of your membership with Crossbow Netball Club and for up to one year after your membership has been terminated. A review is conducted annually by our Club Secretary and Membership & Affiliation Secretary to ensure that the information of anyone who has terminated their membership is removed from our data systems. Hardcopy forms will be securely disposed of, all associated information will be deleted from electronic databases and email addresses will be removed from the club contact list.

Any members that wish to retain their information with Crossbow Netball can do so by requesting it with our Data Protection Lead, Naomi Colton on naomilerway@hotmail.com. 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 in this policy. 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. This is in the form of a tick box and signature on our U18 New Member Form.

**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. See below for more information.

Marketing information covers information about tickets to events, special offers, opportunities, products and services and other commercial information.

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 Crossbow Netball Club
* From Crossbow Netball Club about its sponsors and partners

If you want to receive information from either of these two groups but haven’t yet requested it, you can do so by requesting it with our Data Protection Lead, Naomi Colton on naomilerway@hotmail.com.

**Withdrawing consent**

If we contact you and you want to change how – or if – you receive our communications, please contact our Data Protection Lead, Naomi Colton on naomilerway@hotmail.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
* South West Regional Netball League
* Avon Netball League
* Where the law requires it. We may disclose your information to third parties if we are under a duty to comply with any legal obligation.

**Profiling**

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

**International transfer**

International organisations we work with:

Crossbow Netball Club does not currently 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 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.

Our website 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 accept 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.

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| Right of access | You have the right to obtain confirmation from Crossbow 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 Crossbow 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 Crossbow 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 Crossbow 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 Crossbow Netball Club to provide you with the personal data about you which you have provided to Crossbow Netball Club in a structured, commonly used and machine-readable format.  You also have the right to oblige Crossbow 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 | Crossbow 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 [crossbownetball@gmail.com](mailto:crossbownetball@gmail.com) or our Data Protection lead on naomilerway@hotmail.com.

Crossbow 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, email: [casework@ico.org.uk](mailto:casework@ico.org.uk).

**Document Reviews and Changes**

It is important that our club documents are reviewed regularly and kept up to date. Any changes to this document must be outlined in the table below. This document may only be edited by the Data Protection Lead or Chairperson of Crossbow Netball Club.

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| --- | --- | --- | --- |
| **Date** | **Description of changes made** | **By** | **Role** |
| 07/02/2019 | Document created. | Naomi Colton | Chair |
| 23/07/2020 | Annual Review. One small edit on Page 2, ‘Contract’ section, point iii.  I have removed “Affiliate members to the appropriate leagues…”  And replaced with “Set up appropriate affiliation packages for members to choose from on the MyNet site…”  This edit reflects the change in the affiliation process that took place for the 2019/2020 season. | Naomi Colton | DPL |
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