



Data Protection Policy

Cambourne Exiles Rugby Football Club : www.cambourneexiles.com
(agreed at the 2016 AGM)

This policy sets out Cambourne Exiles Rugby Football Clubs (the club) commitment to protecting personal data and how that commitment is implemented with regards to the collection and use of personal data.

The club will collect and hold necessary data on:

- members of the club;
- parents of junior players and supporters who submit personal data;
- sponsors and business partners;
- referees and other officials.

The club is committed to:

- ensuring that it complies with the eight data protection principles, as listed below
- meeting its legal obligations as laid down by the Data Protection Act 1998, although as a 'not-for-profit' organisation, it is not required to register with the Information Commissioner's Office (ICO);
- ensuring that data is collected and used fairly and lawfully
- processing personal data only in order to meet its operational needs or to fulfill its legal requirements
- taking steps to ensure that personal data is up to date and accurate
- establishing appropriate retention periods for personal data
- ensuring that data subjects' rights can be appropriately exercised
- providing adequate security measures to protect personal data
- ensuring that a nominated officer is responsible for data protection compliance and provides a point of contact for all data protection issues
- ensuring that all club officers are made aware of good practice in data protection
- providing adequate training for all staff responsible for personal data
- ensuring that everyone handling personal data knows where to find further guidance
- ensuring that queries about data protection, internal and external to the organisation, are dealt with effectively and promptly
- regularly reviewing data protection procedures and guidelines within the club

Data protection principles

Personal data shall be processed fairly and lawfully

- data is only collected with the consent of the data subject (or in the case of junior members with the consent of parents);
- data on players and coaches will be passed to the RFU and to Hampshire RFU for competition and other appropriate purposes;
- for the sake of administrative convenience, members are requested to register on the club's website and, as a consequence they are giving consent that certain personal data including contact data entered by them will enter the public domain.

Personal data shall be obtained for one or more specified and lawful purposes, and shall not be further processed in any manner incompatible with that purpose or those purposes

- personal data will not be shared with any third party except with the express and specific consent of the data subject.

Personal data shall be adequate, relevant and not excessive in relation to the purpose or purposes for which they are processed

- this data may include:
 - i. ethnicity and disability data which may be used to identify and keep under review equality of opportunity at the Club and within the game, and (anonymously) for statistical and reporting purposes;
 - ii. Injuries data which may be used to identify and keep under review equality of opportunity at the Club and within the game, and (anonymously) for statistical and reporting purposes;
 - iii. criminal records data - the RFU is registered with the Criminal Records Bureau (CRB) to assist it in ensuring that those who take up appointments do not pose a risk to the children in its care and as such RFU may process criminal records data disclosed by the CRB, which will be processed in accordance with the CRB's Code of Practice.

Personal data shall be accurate and, where necessary, kept up to date

- all data will be factual, accurate and subject to regular updating.

Personal data processed for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes

- data which is no longer relevant will, after a reasonable period, be destroyed.

Personal data shall be processed in accordance with the rights of data subjects under the Data Protection Act 1998.

Appropriate technical and organisational measures shall be taken against unauthorised and unlawful processing of personal data and against accidental loss or destruction of, or damage to, personal data

- all paper records will be kept secure and physical access will be restricted to officials of the club and to the data subject;
- all electronically held data will be kept secure and officials of the club who work either at home or using mobile devices to are required by the club to ensure that data is secure with adequate firewalls, virus protection etc in place and that laptops and other mobile devices are kept physically secure.

Personal data shall not be transferred to a country or territory outside the European Economic Area unless that country or territory ensures an adequate level of protection for the rights and freedoms of data subjects in relation to the processing of personal data

Data Subject Access Requests

The data subject may request access to records held by the club on him/her. Such information will be provided within 40 days of the request. The club may charge of fee of £10 for the disclosure. Data will only be disclosed if:

- a living individual can be identified from the data;
- the data relates to the identifiable living individual, whether in personal or family life, business or profession;
- that data is obviously about a particular individual;
- the data linked to the individual provides particular information about that individual;
- the data is used to inform or influence actions or decisions affecting an identifiable individual;
- the data has biographical significance in relation to the individual;

- the data focuses or concentrates on the individual as its central theme rather than some other person; or
- the data impacts or has the potential to impact on an individual whether in a person, family, business or professional capacity.

Data will not be disclosed in such a way as would identify a third party.

The following statement will be attached to all club communication which requires personal detail to be entered

DATA PROTECTION ACT

The information that is required in this document may be stored on a computer and, if so, it is subject to the Data Protection Act 1984. The Act requires that all the information is strictly confidential and may only be accessed by those with the legal right to see it. The information will not be given to anyone else without your written consent.

You have the right to examine the information that is stored on a computer at any reasonable time. You have a right to correct any information that you feel is wrong or misleading. Please contact the Club Secretary or Data Protection Officer if you wish to examine the information stored about you or your child