

# FETCHAM NETBALL CLUB PRIVACY POLICY

Fetcham Netball Club (“FNC”) 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.

## WHO ARE 'WE'?

We have an obligation under European legislation – the General Data Protection Regulation ('GDPR') to provide you with information about how and why we use your data.

In this policy, whenever you see the words 'we', 'us' or 'our', it refers to FNC.

FNC is a Data Controller for the purposes of GDPR. Due to the social and recreational purpose of FNC, we are not obliged to be registered with the Information Commissioner's Office but we do 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.

FNC does not have a Data Protection Officer and we are not legally obliged to. However, for information and queries about data protection compliance, email: [fncsecretary@gmail.com](mailto:fncsecretary@gmail.com)

## 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**

Below are examples of the sorts of data that we may collect:

- Full name and personal details (e.g. photograph, driving licence, passport number);
- Contact information (e.g. home address, email address, telephone numbers);
- Date of birth and/or age;
- Financial information, such as bank account number and sort-code for standing orders and or to pay you any over payment of club fees;
- Special categories of data (this is for the AENA diversity monitoring section of their application form) such as medical history or race or ethnicity, disability or sexual orientation;
- Health information, next of kin and emergency contact information;
- Imagery in video and/or photographic form for our website and Facebook page and any other online social media;
- Records of participation at training/ matches/ social events/ sessions/ competition;
- Records of enquiries and correspondence with you;
- Correspondence email lists; and
- Certain other information which you volunteer when being a member or seeking to enquire about becoming a member.
- Criminal convictions and offences when dealing with our Hawks team.

By volunteering this information, you are consenting to us using it in the manner set out in this privacy policy.

## PURPOSE

### ***How we collect your information***

We may collect your personal data in a few limited ways, namely:

- Directly from you, when you fill in an application for membership.
- When you provide information via the Club's website and or through email and or through Teamer, and or when you interact with us during your time as a member in various other ways (for example when you enter a competition or renew your membership).
- When you provide information when agreeing to a club social event, competition and or tour.

### ***How we use your personal information***

Personal data provided to us will be used for the purposes set out at the time of collection and, where relevant, in accordance with any preferences you express. More generally, we will use your personal data for the following purposes:

- Administration of your club membership and day to day running of the club, including:
  - Correspondence with you and informing you about training, matches, socials, competitions, and any other related information.
  - Registering you with All England Netball Association (AENA) and any leagues or competitions we participate in.
  - Taking payment of membership fees and any other payments.
  - Statistical analysis about who is playing or training.
  - Communication about our club activities, changes to matches, training or information we think may be of interest to you.
  - Where this is necessary for our legitimate interests (for example in increasing use of club participation in general).

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.

## WHY CAN WE PROCESS YOUR DATA

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 FNC and how we might use information you provide to us:

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

- To comply with health and safety requirements. For example, to ensure the safe running of training and matches and to enable adaptations as required;
- To comply with safeguarding requirements. For example, working with children or vulnerable adults.

### ***Where there is a LEGITIMATE INTEREST. For example:***

- To administer membership and all administrative aspects to being a member of the club;
- To correspond and to answer queries from members and leagues and affiliations;
- To arrange for any trips or transport of members to events;
- To administer the relationship we have with players;
- To comply with AENA and league obligations; and
- To administer and monitor attendance at training and or matches.

### ***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 leagues and or AENA events or services; and

## WHO WE SHARE YOUR DATA WITH

We only share personal data where we are required by law or with our suppliers or any type of person who provides services to 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 third parties 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

- We may share data between the Hawks and Ladies section of FNC;
- AENA;
- Leagues such as KDNL, SNL, Surrey County Netball Association, Guildford Netball League (Surrey Sports Park), Mature Netball League (Saints and Brads Netball Clubs);
- Regional Netball Associations;
- Affiliated netball clubs;
- Companies and other persons who help us to provide training, training and match kit and equipment.

- 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; and
- Anyone else where we have your consent.

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

## 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 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.

## KEEPING 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 six years after your last interaction with the club.

## WEBSITE

Your internet browser has the in-built facility for storing small files – “cookies” – that hold information which allows the website to recognise your account. Our website takes advantage of this facility to enhance your experience. You can prevent your computer from accepting cookies, but if you do, certain functionality on the website may be impaired.

We may directly collect analytical data or use third-party analytics tools and services such as Google Analytics and HubSpot to help us measure traffic and usage trends for our service. These analytical tools collect information sent by your browser or mobile device, including the pages you visit and other information that may assist us in improving our service.

We may also, without limitations, collect and use the following type of information when you visit and/or interact with Fetcham Netball Club on the website:

Google Analytics: We use Google Analytics to allow us to identify information on user’s activities on the site including; page views, source and time spent on our website. We use this information to gather reports to help us improve our site. This information is then collected and reformatted to be displayed as statistical information as numbers, which means that it cannot be tracked back to individuals.

We may also collect your name, contact information, e-mail address and any information provided when you freely provide information by: emailing our membership secretary and or any other FNC email address and or by filling out a “Form” through the website. If you contact us, we may keep a record of that correspondence.

## 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. We have a separate privacy policy for children that can be accessed on our website.

## 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.

## WITHDRAWING CONSENT

If you want to withdraw consent please email [fncsecretary@gmail.com](mailto:fncsecretary@gmail.com)

## INTERNATIONAL TRANSFER

The personal information we collect may be transferred to and stored in countries outside of the UK and the European Union. Where this happens we will take relevant measures to ensure your data is securely transmitted.

## YOUR DATA RIGHTS

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

|   |   |
|---|---|
| Right of access   | You have the right to obtain confirmation from FNC 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 FNC 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 FNC to erase personal data concerning you.  |
| Right to restriction of processing                            | You have the right (under certain circumstances, but not all) to oblige FNC 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 FNC to provide you with the personal data about you which you have provided to FNC in a structured, commonly used and machine-readable format.<br>You also have the right to oblige FNC 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 | FNC 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 [fncsecretary@gmail.com](mailto:fncsecretary@gmail.com)

FNC 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; <https://ico.org.uk/make-a-complaint/>

## 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: 23/5/18.