

# Surbiton Hockey Club

## Data Protection Policy

This Data Protection Policy sets out how Surbiton Hockey Club ("we", "our", "us", the "Club") handles the Personal Data of our members, trustees, employees, volunteers and other third parties.

This Data Protection Policy applies to all Personal Data we Process regardless of the media on which that data is stored.

This Data Protection Policy applies to all Club Personnel. This Data Protection Policy sets out what we expect from Club Personnel for the Club to comply with applicable data protection law.

This Data Protection Policy is an internal document and cannot be shared with third parties, members or regulators without prior authorisation from the Captain of the Club.

### Definitions

**Club Personnel:** all employees, volunteers, contractors, agency workers, consultants, trustees and members of the SHC Executive Board.

**Consent:** agreement which must be freely given, specific, informed and be an unambiguous indication of the Data Subject's wishes by which they, by a statement or by a clear positive action, signifies agreement to the Processing of Personal Data relating to them.

**Data Subject:** a living, identified or identifiable individual about whom we hold Personal Data.

**General Data Protection Regulation (GDPR):** the General Data Protection Regulation ((EU) 2016/679).

**Personal Data:** any information identifying a Data Subject or information relating to a Data Subject that we can identify (directly or indirectly) from that data alone or in combination with other identifiers we possess or can reasonably access. Personal Data includes Sensitive Personal Data and pseudonymised Personal Data but excludes anonymous data or data that has had the identity of an individual permanently removed.

**Personal Data Breach:** any act or omission that compromises the security, confidentiality, integrity or availability of Personal Data or the physical, technical, administrative or organisational safeguards that we or our third-party service providers put in place to protect it. The loss, or unauthorised access, disclosure or acquisition, of Personal Data is a Personal Data Breach.

**Privacy Notices:** separate notices setting out information that may be provided to Data Subjects when the Club collects information about them.

**Processing or Process:** any activity that involves the use of Personal Data. It includes obtaining, recording or holding the data, or carrying out any operation or set of operations on the data including organising, amending, retrieving, using, disclosing, erasing or destroying it. Processing also includes transmitting or transferring Personal Data to third parties.

**Sensitive Personal Data:** information revealing racial or ethnic origin, political opinions, religious or similar beliefs, trade union membership, physical or mental health conditions, sexual life, sexual orientation, biometric or genetic data, and Personal Data relating to criminal offences and convictions.

## Scope

Protecting the confidentiality and integrity of Personal Data is a critical responsibility that we take seriously at all times. The Club is exposed to potential fines of up to 20 million euros or 4% of total worldwide annual turnover, whichever is higher, for failure to comply with the provisions of the GDPR.

All members of the SHC Executive Board are responsible for ensuring all Club Personnel comply with this Data Protection Policy and need to implement appropriate practices, processes, controls and training to ensure such compliance.

The SHC Executive Board is responsible for overseeing this Data Protection Policy.

Club Personnel should contact the Club Captain at clubcap@surbitonhc.com with any questions about the operation of this Data Protection Policy or the GDPR or if they have any concerns that this Data Protection Policy is not being or has not been followed.

## Processing of Personal Data and Grounds for Doing So

Personal data must be Processed lawfully, fairly and in a transparent manner in relation to the Data Subject.

The Club may only collect, Process and share Personal Data fairly and for specified, explicit and legitimate purposes. The GDPR restricts our actions regarding Personal Data to specified lawful purposes. These restrictions are not intended to prevent Processing, but ensure that we Process Personal Data fairly and without adversely affecting the Data Subject.

The Club cannot use Personal Data for new, different or incompatible purposes from that disclosed when it was first obtained unless the Club has informed the Data Subject of the new purposes and they have Consented where necessary.

Where the Club relies on Consent as the ground for Processing personal data, the Club will need to evidence Consent captured and keep records of all Consents so that the Club can demonstrate compliance with Consent requirements.

## Membership Databases

The Club uses databases for its membership data:

- a) Teamo is currently used for both the adult and junior membership registrations and subscriptions. This also includes Friends of SHC (1874 Club), who are former members. The Teamo app includes a team management system and a “chat” facility. The database includes a register function and has the option to include the health data of the members attending so the coaches and manager can have immediate access to this.
- b) England Hockey’s Game Management System (GMS) will be used for registration of all Senior and Junior members. Junior players should be 13 years and over to play in the senior leagues.

The Club may keep back-up registers where necessary. These registers must be kept up to date to ensure accuracy of data and should only be used where necessary to ensure that the storage of personal data is minimised.

If an employee or volunteer of the Club is storing data on their own computer system or using a cloud-based document such as google documents or Office 365, they must inform the Club of this use. When an employee leaves or a volunteer stops volunteering with the Club, all Personal Data that they hold must be returned to the Club, or deleted if the Club so chooses.

## **Email Communications**

The Club sends emails to members with details of upcoming events and fixtures. It is necessary for the Club to send such emails to individuals for the performance of the contract between the Club and the member. In addition, the Club, including team captains and squad managers, may email or text members regarding any upcoming fixtures arrangements.

Newsletters may also include details about upcoming social events at the Club. These newsletters are coordinated by the Club and if there is any information that you think should be included then please contact [newsletter@surbitonhc.com](mailto:newsletter@surbitonhc.com).

Members have the right to unsubscribe from communications at any time. This can be done by emailing the Club at: [membership@surbitonhc.com](mailto:membership@surbitonhc.com) or if an email is sent via Teamo, by clicking the unsubscribe link in the email. If a member does unsubscribe then please make this aware to the Club Captain. The Club may then consider the best method of communicating with the member to ensure that important information, such as details of fixtures, are not missed.

For further information about the rights of data subjects, please see paragraph 0 (Access to Data and the Rights of Data Subjects).

## **Tickets and Payments**

The Club uses the following systems for payments/ tickets. The privacy policies are noted below.

- Acuity Scheduling for the sale of tickets, camp payments and small group coaching. The privacy policy for Acuity Scheduling can be found at <https://www.squarespace.com/privacy>
- Stripe; The privacy policy for Stripe can be found at <https://stripe.com/gb/privacy>
- Teamo; <https://teamo.chat/tweb/legal/privacy.jsp>

## **Children's Data**

The Club recognises that it Processes the data of children and it recognises that children merit specific protection with regard to their personal data. The Club does not currently offer an information society service to children.

## **Privacy Notices**

Whenever the Club collects Personal Data directly from members, we provide the members with a copy of or a link to our Privacy Notice. The Club acknowledges that its Privacy Notice for Colts members must be accessible to children also, not just their parents. The Club's Privacy Notices can be viewed here:

<http://surbitonhc.com/surbiton-hockey-club-privacy-notice/>

## **Data Minimisation, Retention and Limitation**

Personal Data must be adequate, relevant and limited to what is necessary in relation to the purposes for which it is Processed. The Club must ensure that when Personal Data is no longer needed for specified purposes, it is deleted or anonymised.

Once a player leaves the Club they will be deleted from all relevant databases within the stipulated time period in accordance with current GDPR rules. Please see the privacy policy for the EH's GMS <https://www.englishockey.co.uk/privacy-policy>

## **Accuracy**

The Club shall ensure that the Personal Data we use and hold is accurate, complete, kept up to date and relevant to the purpose for which we collected it.

## **Protecting Personal Data**

Personal Data must be secured by appropriate technical and organisational measures against unauthorised or unlawful Processing, and against accidental loss, destruction or damage.

The Club must exercise particular care in protecting Sensitive Personal Data from loss and unauthorised access, use or disclosure. The main type of Sensitive Personal Data that the Club holds is the health data of members and criminal conviction data where safeguarding checks are carried out.

## **Reporting a Personal Data Breach**

The GDPR requires the Club to notify any Personal Data Breach to the Information Commissioner's Office and, in certain instances, the Data Subject.

If Club Personnel know or suspect that a Personal Data Breach has occurred, they must not attempt to investigate the matter themselves. They must immediately contact the SHC Executive Team.

## **Transfer of Data outside of the EU**

For payments the Club uses Teamo and Acuity Scheduling, both of which may transfer data outside of the EU. Teamo's privacy statement can be found here- <https://teamo.chat/tweb/legal/privacy.jsp> Acuity Scheduling's privacy statement can be found here- <https://www.squarespace.com/privacy>

## **Record Keeping**

The Club employs fewer than 250 people and therefore does not have to comply with the record keeping requirements of Article 30 of the GDPR.

The Club acknowledges however that it must still record processing activities that:

- a) could result in a risk to the rights and freedoms of individuals; or
- b) are not occasional; or
- c) includes special categories of data or personal data relating to criminal convictions and offences.

## **Training**

The Club shall regularly review the training requirements of Club Personnel and shall ensure that key Club Personnel are provided with regular training in relation to data protection.

## **Privacy by Design and Data Protection Impact Assessment (DPIA)**

The Club is required to implement privacy by design measures when Processing Personal Data by implementing appropriate technical and organisational measures in an effective manner, to ensure compliance with data privacy principles.

The Club, as a data controller, must also conduct Data Protection Impact Assessments (DPIAs), which is an assessment used to identify and reduce the risks of a data processing

activity, with respect to high risk Processing. The Club should conduct a DPIA when implementing major system or business change programs involving the Processing of Personal Data.

### **Automated Processing (including Profiling) and Automated Decision-Making**

The Club does not carry out any automated processing (including profiling) or automated decision-making. If in the future the Club does carry out automated processing or automated decision-making, this Data Protection Policy shall be reviewed.

### **Access to Data and Rights of Data Subjects**

Individuals, including Club Personnel, have a right to ask us for a copy of the data we hold about them. If individuals do wish for a copy of their personal data, then they can contact: [membership@surbitonhc.com](mailto:membership@surbitonhc.com)

If any Club Personnel receive a request for data then they must immediately forward any such request to the SHC Executive Team.

Data Subjects also have other rights when it comes to how we handle their Personal Data. These include rights to:

- a) withdraw Consent to Processing at any time;
- b) receive certain information about the Club's Processing activities;
- c) prevent our use of their Personal Data for direct marketing purposes;
- d) ask us to erase Personal Data if it is no longer necessary in relation to the purposes for which it was collected or Processed or to rectify inaccurate data or to complete incomplete data;
- e) restrict Processing in specific circumstances;
- f) challenge Processing which has been justified on the basis of our legitimate interests or in the public interest;
- g) request a copy of an agreement under which Personal Data is transferred outside of the EU;
- h) object to decisions based solely on automated processing, including profiling;
- i) prevent Processing that is likely to cause damage or distress to the Data Subject or anyone else;
- j) be notified of a Personal Data Breach which is likely to result in high risk to their rights and freedoms;
- k) make a complaint to the supervisory authority; and
- l) in limited circumstances, receive or ask for their Personal Data to be transferred to a third party in a structured, commonly used and machine-readable format.

If any Club Personnel receive any request as set out above they must immediately forward any such request to the SHC Executive Team.

### **Changes to this Data Protection Policy**

We reserve the right to change this Data Protection Policy at any time without notice. We last revised this Data Protection Policy on 29/11/21.