



# Birmingham Fencing Club

## Data & Privacy Policy

FEBRUARY 2018 – To be reviewed annually

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## **1. INTRODUCTION**

As a local sports club, BFC holds data which includes members' names, addresses, contact details, and other data, such as bank account/payment details and photos or videos for marketing purposes. We therefore have certain obligations under The Data Protection Act (DPA) 1998 up to 24<sup>th</sup> May 2018 which regulates how personal information should be used and protects people from the misuse of personal details. With affect from May 25<sup>th</sup> 2018, we will be compliant with Data Protection Legislation and the General Data Protection Regulations (GDPR). To this effect, we need to tell people about how and what we do with their data when we collect it.

As a not for profit organisation, BFC does not have to register with the ICO. We do however have to comply with the following principles to ensure that data is:

- Fairly and lawfully processed;
- Processed for limited purposes;
- Adequate, relevant and not excessive;
- Accurate;
- Not kept longer than necessary;
- Processed in accordance with members' rights;
- Kept secure; and
- Not transferred abroad without adequate protection
- Only used for marketing purposes with consent

Individuals also have rights to know what information is held about them.

This document has been put together so that members, coaches, volunteers, parents and everyone associated with BFC (later referred to in this document as Users), are aware of the obligations and this Policy should help to answer any questions or concerns. BFC have appointed a Data Protection Officer to take responsibility for compliance.

## **2. INFORMATION WE COLLECT**

We may collect information from those who contact us via our Website (name, email addresses and telephone numbers), please see Section 12 Websites & Social Media for more information. In addition, via our Application Form, we collect Name, Age, Date of Birth, Address, Email Address and Telephone Number, Parent/Carer details if applicable, Medical & Allergy information and School & College information. We are often contacted on an ad-hoc basis by members, suppliers, associations and others by email too, containing a range of data and information.

We may also collect payment or financial information if provided via our Standing Order form.

BFC require all Users to complete a Data Release Form (Document 005) and select relevant preferences for communication. Any User can opt in or out of such communications at any time by contacting BFC using the details at the end of this document, completing an updated Data Release Form or via the website, 'contact us' facility.

## **3. HOW WE USE INFORMATION**

We may use information to deal with requests and enquiries, to make contact for reasons related to an enquiry, to notify about events, competitions and news, and to provide general club information and updates. We also use information to liaise with suppliers, associations and official bodies when required.

BFC may share your personal information with the police and other law enforcement agencies for the purposes of crime prevention or detection. This is through a tightly controlled process and written requests only, to ensure we comply with Data Protection Legislation.

#### **4. HOW WE STORE INFORMATION**

By submitting personal data, Users agree to the storing and processing of the data as outlined in this policy. BFC will take all reasonable steps to ensure that the data is treated securely and in accordance with legislation. Application Forms and Standing Order Forms, along with all paperwork documentation, are held securely by Mike & Joan Whitehouse, held electronically and encrypted.

A Master Database has been created which has restricted and encrypted access to only Mike & Joan Whitehouse and the nominated Data Protection Officer. This database is in excel form, backed up to a secure file and is password protected. This is to enable quick access in the running of the club for things such as emergency contact details, communications and to update payments received.

All BFC documents are numbered and listed under a Controlled Document Register, showing when they were last reviewed and a description.

Mike & Joan Whitehouse, along with the nominated Data Protection Officer, hold passwords for all documents and log in and password details for the website and social media. Other Club Members may hold these for marketing purposes. Passwords are issued separately to usernames and changed regularly.

Data will be held for the duration of membership, coaching, employment or volunteering with the club and will be amended or deleted on request. Data will be archived for those no longer attending the club, should they wish to return.

All data will be audited annually for accuracy – see also Section 8 Deleting Data

#### **5. OUR LEGAL BASES FOR PROCESSING INFORMATION**

We will process data on the basis of the following legitimate interests:

- For the administration of a sports club
- Competition entries and results
- Responding to queries
- Updating contact information
- Providing relevant and necessary news and information via email, text, post, website, social media and telephone

#### **6. YOUR RIGHTS AND CONSENT**

Individuals have the following rights under Data Protection Legislation:

- To access a copy of the information comprised in collected data
- To object to the processing of personal data that is likely to cause or is causing damage or distress
- To prevent processing for direct marketing
- To have inaccurate personal data rectified, blocked, erased, or destroyed
- To claim compensation for damaged caused by a breach of data protection legislation

Complaints or questions should be sent in the first instance to:

David Wray, Data Protection Officer for BFC  
Email: [wraydavid565@gmail.com](mailto:wraydavid565@gmail.com)

We obtain consent to collect, use and store your data in line with this policy via our Data Release Form (Document 005).

## **7. FINDING OUT WHAT DATA WE HOLD – SUBJECT ACCESS REQUESTS**

Under the Data Protection Legislation, Users can ask to see any personal information that we hold about them. Such requests are called ‘Subject Access Requests’. If Users would like to make a subject access request, please contact the BFC’s Data Protection Officer:

David Wray, Data Protection Officer for BFC  
Email: [wraydavid565@gmail.com](mailto:wraydavid565@gmail.com)

This information is provided free of charge and will be provided within one month. BFC keep a log of all subject access requests including the date of the request and the date and details of the response, to ensure compliance within this timeframe. Those requesting access should do so in writing and may need to provide identification and if appropriate, any particulars about the source or location of the information being requested.

## **8. WHAT INFORMATION IS SHARED AND HOW**

BFC will never share User details with third parties for marketing purposes without express permission. We will share only what is needed, and where possible, will anonymise data before sharing. If we would like to share User information for any other purpose, we will ask for specific consent. Information is generally shared as follows:

- with club coaches or officials to administer training sessions
- with club coaches to enter events and competitions
- with leagues, associations, and competition providers for entry in events and the publishing of results
- anonymised data shared for potential funding or obtaining grants
- processing of membership forms and payments
- for marketing and promotion of the club, (including social media) – See Section 13 Websites and Social Media
- with the University of Birmingham for access to the centre via a swipe card

We may publish User personal information as part of the results of an event or competition and may pass such information to the governing body or any affiliated organisation for the purpose of insurance, licences or for publishing results either for the event alone or combined with or compared to other events. Results may include (but not be limited to) name, any club affiliation, times, occupation and age category.

## **9. DELETING DATA**

Data will be held for the duration of membership, coaching, employment, or volunteering with the club and will be deleted on request.

## **10. COMMUNICATIONS AND EMAIL**

Group emails, newsletters, course updates and all communications should be sent with no data identifiers included. Email addresses should be included as 'bcc' and should not contain personal data. Users, and those in receipt of such group or individual emails, should not forward or share the content without the express permission of the BFC Data Protection Officer. The same rule of thumb applies to posted material, text messages and all communication formats. Documents should be password protected and the password issued separately where appropriate. Only those that have opted in to receive such communication via the Data Release Form should be included.

## **11. CONTROLLED DOCUMENTS**

All BFC documents are controlled and listed on a Controlled Document Register (Document 006). These documents should only be amended and updated by the Data Protection Officer or Mike Whitehouse, Senior Coach.

## **12. AUDITING**

All data held by BFC and the process of holding such data will be subject to a regular (at least annual) audit to ensure that only relevant data is held. This audit should include a risk assessment and resilience testing.

## **13. CHILDREN**

As a sports club with child members, we have made our policy as simple as possible and our privacy notice and data release forms are in plain English. Parents/Carers should complete the Application Form, Data Release Form and all other information on behalf of those under 18. There are additional protections for children's personal data - we obtain consent from the parent or guardian to process the personal data of any children associated with BFC.

## **14. WEBSITES AND SOCIAL MEDIA**

This Policy also explains User privacy choices when using our website. When visiting our website, a User's IP address (which is a unique identifier that computers and devices use to identify and communicate with each other) is automatically recognised by our web service provider, Go Daddy, with whom we have a written contract. We may use your IP address via Go Daddy to monitor traffic and gather browsing information and behaviours of visitors to our website. We will not use IP addresses to identify Users in any way.

The internet is not generally a secure medium for communication and therefore we cannot guarantee the security of information sent to us over the internet. We use a reputable web provider, ensuring that we are taking all reasonable steps to protect data.

Cookies are a piece of text that a website transfers to a computer's hard disk, in order to remember who visitors are. Cookies interact with a computer and our website to remember details and preferences from previous visits. A cookie does not give access to computers and only the site that created the cookie can read it. Users can restrict or block cookies by accessing their internet browser settings.

BFC will take photos and videos of members and activities to use for marketing and promotional purposes, such as Facebook, Instagram, Newsletters and our Website. Once these are in the public

domain, BFC can lose control over these images, so it is essential that you read and sign the Data Release Form correctly. If you choose not to be included in this, you should indicate this clearly on the form. For clarity, you should opt in or opt out via the Data Release Form and specify your wishes. Parents/Carers should do this on behalf of under 18s.

## **15. BREACHES**

BFC will only have 72 hours from being aware of a breach to reporting it to the ICO. For example, if a membership secretary holds the membership data on their laptop and it is not encrypted and gets stolen - the data is now at risk and a breach would have to be reported. BFC will make sure that personal data is held securely, i.e. that electronic documents are encrypted, and password protected where appropriate, and that they are backed up on a regular basis. BFC will also make sure that Users can identify when a breach has happened and know what they should do and who they should talk to.

## **16. DATA PROTECTION OFFICER**

BFC's nominated Data Protection Officer is:

David Wray, Data Protection Officer for BFC  
Email: [wraydavid565@gmail.com](mailto:wraydavid565@gmail.com)

## **17. INTERNATIONAL**

BFC do not currently operate as a club outside of the UK, therefore our lead authority is the UK. Should this change in the future (international competing etc), then the policy will be reviewed. Please also refer to Section 13 – Websites and Social Media.

## **18. CONTACTING US ABOUT THIS POLICY**

Questions regarding this policy or any data issues, should be made to:

David Wray, Data Protection Officer for BFC  
Email: [wraydavid565@gmail.com](mailto:wraydavid565@gmail.com)

**Contact: Mike Whitehouse**

**Email: [mikejoanfencing@hotmail.com](mailto:mikejoanfencing@hotmail.com)**

**Mobile: 07973 632831 Tel: 0121 443 3136**

**Contact Address: 208 Wheelers Lane, Kings Heath, Birmingham B13 0SR**

**Venue Address: University of Birmingham Sport & Fitness Centre, Edgbaston, Birmingham B15 2TT**

**Website: [www.birminghamfencingclub.org.uk](http://www.birminghamfencingclub.org.uk)**

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