



# Worthing Larks Data Protection Policy and Procedures

## 1. Definitions

- 1.1. Personal data is information about a person which is identifiable as being about them. It can be stored electronically or on paper and includes images and audio recordings as well as written information.
- 1.2. Data protection is about how we, as an organisation, ensure we protect the rights and privacy of individuals, and comply with the law, when collecting, storing, using, amending, sharing, destroying or deleting personal data.

## 2. Responsibility

- 2.1. Overall and final responsibility for data protection lies with the committee, who are responsible for overseeing activities and ensuring this policy is upheld.
- 2.2. All members are responsible for observing this policy, and related procedures.

## 3. Overall Policy Statement

- 3.1. Worthing Larks needs to keep personal data about its committee and members in order to carry out the group's activities.
- 3.2. Consent to share data for children under 13 must be given by a parent/carer
- 3.3. We will collect, store, use, amend, share, destroy or delete personal data only in ways which protect people's privacy and comply with the General Data Protection Regulation (GDPR) and other relevant legislation.
- 3.4. We will only collect, store and use the minimum amount of data that we need for clear purposes, and will not collect, store or use data we do not need.
- 3.5. We will only collect, store and use data for:
  - purposes for which the individual has given explicit consent, or
  - purposes that are in our our group's legitimate interests, or
  - contracts with the individual whose data it is, or
  - to comply with legal obligations, or
  - to protect someone's life, or
  - to perform public tasks.
- 3.6. We will provide individuals with details of the data we have about them when requested by the relevant individual.
- 3.7. We will delete data if requested by the relevant individual, unless we need to keep it for legal reasons.
- 3.8. We will endeavour to keep personal data up-to-date and accurate.
- 3.9. We will store personal data securely.
- 3.10. We will keep clear records of the purposes of collecting and holding specific data, to ensure it is only used for these purposes.
- 3.11. We will not share personal data with third parties without the explicit consent of the relevant individual, unless legally required to do so.

- 3.12. We will endeavour not to have data breaches. In the event of a data breach, we will endeavour to rectify the breach by getting any lost or shared data back. We will evaluate our processes and understand how to avoid it happening again. Serious data breaches which may risk someone's personal rights or freedoms will be reported to the Information Commissioner's Office within 72 hours, and to the individual concerned.
- 3.13. To uphold this policy, we will maintain a set of data protection procedures for our committee and members to follow. These are given in the Appendix below.

#### **4) Review**

This policy will be reviewed every two years

Date 3<sup>rd</sup> August 2020

#### **Appendix – Data Protection Procedures**

- Emails will be shared with the foreman for the purpose of emailing out weekly practice schedules
- Additional data (eg phone numbers, DOB, contact numbers, health conditions, etc) will be held solely by the Bag/Treasurer for the purpose of administering insurance and other lawful purposes for example:
  - We require your date of birth in order to offer personal injury insurance and will be shared with Royal Sun Alliance
  - We require an emergency contact number
- Both Foreman and Bag/Treasurer will hold members' information on their personal devices which will be password protected
- Registration/Annual Membership Forms can be completed electronically or as paper copies. Paper copies will be kept by the Bag/Treasurer in a secure filing cabinet.
- Phone numbers will be given individually by members to the committee member who sets up the WhatsApp group, thereby giving their individual permission for their number to be shared with the group
- Members agree to abide by the Privacy Policy, when signing the Registration/Annual Membership Form
- Data will be updated annually and previously completed paper forms will be shredded.
- If members leave Worthing Larks their data will automatically be removed within one month of them writing to the foreman to advise them of their wish to leave.
- If anyone wishes to have their data amended or deleted, they can contact the Treasurer who will act on their wishes within 14 days of receiving the request. The Bag/Treasurer can be contacted on [somptinglarks@gmail.com](mailto:somptinglarks@gmail.com)