



Luctonians Sports Club

General Data Protection Regulation Policy

This General Data Protection Regulation (GDPR) policy is an overarching policy and is designed to be read in conjunction with other specific policies that deal with specific aspects of data protection and data security. The Policy sets out Luctonians Sports Club Ltd and Luctonians Ltd commitment to protecting personal data and how both entities will implement that commitment with regards to the collection and use of personal data and special category data as defined in the GDPR.

Luctonians Sports Club Ltd wholly owns Luctonians Ltd and as such it is recognised by both entities that they have to comply with GDPR and as defined in the resource sharing agreement that both will comply with the same policies and procedures in respect of data protection and security. Throughout the policies and procedures any reference to 'the Club' will mean both Luctonians Sports Club Ltd and Luctonians Ltd.

The Club recognise that it has to produce policies that cover data handling from various aspects, that the Club is a data controller and a data processor. It recognises that it has to meet the requirements of Members, Staff and other individuals as well as the requirements of other parties such as the governing bodies of other sports as well as official bodies it is required to supply personal data to.

The Club is committed to:

- Ensuring that we comply with the eight data protection principles, as listed below
- Meeting the legal obligations as laid down by the General Data Protection Regulations
- Ensuring that data is collected and used fairly and lawfully
- Processing personal data only in order to meet our operational needs or fulfil 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 enquiries about data protection, internal and external to the organisation, are dealt with effectively and promptly (requests made by the Police or other legal authority such as HMRC see appendix A)
- Regularly reviewing data protection procedures and guidelines within the club

Data protection principles

1. Personal data shall be processed fairly and lawfully
2. 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
3. Personal data shall be adequate, relevant and not excessive in relation to the purpose or purposes for which they are processed
4. Personal data shall be accurate and, where necessary, kept up to date
5. Personal data processed for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes



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6. Personal data shall be processed in accordance with the rights of data subjects under the General Data Protection Regulations.
7. Data subjects have the right to access their personal data and to make requests as stipulated in the GDPR
8. 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
9. 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

Consent to keeping and using personal data

The Club recognises that though it collects and process personal data under the lawfully authority of Legitimate Interest, there are times when individuals will be asked to consent to giving their data for specific reasons to be used in specific defined ways. When this is the case the Club will seek specific consent, and will give a detailed reason why and how this requested data will be used. If a person gives such consent they have the right to requested that the Club stops processing their data for that purpose at any time without giving a reason. Upon receiving such a request, the Club will stop processing such data as soon as is reasonably practicable.

Personal Data and Special Category Retention and Destruction

Unless specifically stated in any other under mentioned Policies personal data given to the Club will be retained for a period of 3 years after last use. In cases of personal data that is linked to financial matters such data will be retained in accordance with HMRC's instructions.

Special Category data (such as medical information) will be retained for as long as is necessary and as soon as such information is no longer necessary or required to be kept or at the instruction of the data subject it will be deleted and destroyed at the earliest opportunity.

When data is to be destroyed it will be done so securely and efficiently. Data that is electronically held will be subject to secure deletion and electronic hardware that data is held on will be destroyed in an appropriate way that insures that the data cannot ever be recovered.

The destruction of written data or paper recorded data and files will be done via the following process:

1. All such data will be returned to the club office for destruction
2. The Club Office will hold a suitable secure receptacle in an accessible place for members to return such data to
3. The Club office will have a suitable secure receptacle in the office area for club staff to use for the collection of such data to be destroyed
4. A nominated Club employee will be responsible for the collection of items from the receptacles then shred the data using a cross shredder. The resultant waste can then be disposed of accordingly



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5. The secure receptacles will have key access, the keys will be kept in the secure key cupboard and every time access is required to these receptacles a record will be made of the time and date the access was made, who had access and the reason for access.

Also see GDPR Data Security Policy

Data Protection by design

A key principle of the General Data Protection Regulation is Data Protection by design. This means that data protection needs to be a key element in the day to day workings of the Club. It should become second nature when any new project or functionality of the club is introduced that data protection issues are considered and addressed at the outset and a Data Protection Impact Assessment is carried out.

It is accepted that as technology develops and new technology is introduced so data protection policies and procedures need to be reviewed and updated to meet the possible demands of such developments.

Following the above two principles will mean that the Club is able to keep its Data Protection policies up to date and relevant to the data processing and recording that it is doing.

All GDPR policies and procedures will be reviewed every 3 years since their last review or amendment to ensure that they are relevant and fit for purpose. All recorded Policies and Procedures will display the Month and Year that they were last reviewed and so are kept current.

Breaches of the General Data Protection Regulations

Any identified breach of the General Data Protection Regulation or of the Club's Policy and Procedures in respect of GDPR must be reported immediately to the Club's Data Protection Officer for investigation.

The Club's data protection officer will be responsible for carrying out any investigation in the stipulated time frames and the reporting of relevant breaches to the Information Commissioner's Office (ICO) in the required time frame if so applicable.

On completion of the investigation the Data Protection Officer will report to the Management Committee of Luctonians Sports Club with recommendations of actions to be taken. If it is recommended that discipline procedures should be invoked against any identified individual then the Club's discipline policy and procedure will be followed.

If required the Club will assist in every way possible any investigation required to be undertaken by the ICO or other lawful authority. Any resultant recommendations made by the ICO will be implemented.



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Other relevant General Data Protection Regulation Policies:

The above policy should be read in conjunction with the following policies, procedures and documents:

- GDRP Children's Policy
- GDRP Data Security Policy
- GDRP Electronic Communications
- GDRP Lawfully Authority Assessment Policy
- GDRP Marketing Policy
- GDRP Privacy Notice (Adult)
- GDRP Privacy Notice (Child & YP)
- GDRP Subject Access Request Procedure
- GDRP Subject Access Request
- GDRP Websites, Social Media Platform the taking and storing of Images and Videography

For all enquiries about any of the above documents or Policies or any other aspect of data protection please contact the Club's Data Protection Officer via email: dpo@luctonians.co.uk

For further information on data protection please visit the Information Commissioner's Officer website, www.ico.org.uk

Nothing in the above policies affects any single individual's personal rights.

Signature:

Date:



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Appendix A

Disclosure of personal information to the Police for crime related purposes

