



Luctonians Sports Club

Lawful Authority to process Personal Data and Legitimate Interest Assessment Policy

Luctonians Sports Club Limited incorporating Luctonians Ltd have identified that the lawful authority under which the organisations collect and process individuals' personal data and in some cases Special Category Data (such as some members medical data) is that of **Legitimate Interest**.

This decision has been arrived at following consultation with the ICO and the following facts:

1. Purpose

Luctonians Sport Club Ltd exists to provide its members with the opportunity to further their individual interests in a particular sport or sports on offer by the organisation as laid out in rule 3 of the Rules of Luctonians Sports Club Limited.

'3 Objects

The objects for which the Club is established are:

- 3.1 To promote community participation in healthy recreation by providing facilities for playing rugby union football and other sports (facilities mean land, buildings, equipment and organising sporting activities);
- 3.2 To provide and assist in providing facilities for sport, recreation or other leisure time occupation of such persons who have need for such facilities by reason of their youth, age, infirmity or disablement, poverty or social and economic circumstances or for the public at large in the interests of social welfare and with the object of improving their conditions of life; and
- 3.3 To advance the education of children and young people through such means as the Directors think fit in accordance with the law of charity.

2. Necessity

In order that Luctonians Sports Clubs can provide the services laid out in the rule 3 of the Clubs Rules it is necessary to be able to:

- Identify its members and be able to communicate with them via letters, email, texts, phone calls and social media platforms and websites.
- It is necessary and expected that the Club provides critical and relevant information to our members via a variety media.
- It will be necessary to process certain financial information that members give in respect of membership charges. Also, members will be issued with membership cards that carry electronic identifiers entitling some members to have access to preferential rates for goods and services purchased at the Club premises.
- It is necessary to collect certain personal data on behalf of sporting Constituent Bodies or Governing Authorities as required so a member can participate in a chosen sport in an age and gender appropriate environment.
- In order to provide members with the best possible options for sporting opportunities it will be necessary and expected by the members that the Club will promote itself, the sports that are offered, the ethos and spirit of those sports, the achievements of the Club, individual members and teams across arrange of media including electronic, press and social media platforms both in words and by the use of photographs and videography.



Luctonians Sports Club

It is recognised that in order for members to fully engage with their chosen sports that in some cases it will be necessary for the members' own benefit that the club is in possession of some Special Category Data such as medical information to insure safe participation. Next of kin details will be held in case of medical or other emergencies. The holding of this information is necessary in order that members can safely take part in sport and enjoy the facilities on offer, it is also proportionate in respect of the members right to fully engage in their requested membership of Luctonians Sports Club Ltd.

Where it is necessary for a member's personal data to be passed to a Constituent Body or Sporting Authority of a sport to enable members to participate in that particular sport, the Club will pass on such data to the Constituent Body or Sporting Authority.

The Club fully recognises that photographic and videography is a form of personal information. The Club acknowledges the right to collect such data to celebrate the ethos and spirit of sports for which the Club exists to provide for its membership and so to promote the Club's and its members interests. The Club also recognises the individual member's right to state how such data is processed and used.

3. Balancing

The questioning of balancing the Clubs legitimate interest with the individual's rights to privacy is one that is achieved in favour of the club holding the data and using it in the prescribed ways as the functioning of the Club and the services it provides its membership could not be met without access to and the use of this data.

The Club recognises is has a duty to keep personal information and where collected Special Category Data private and this is reflected in the Clubs Privacy Policy and other policies that relate to GDPR. Each member will be given the option as to what data is to be held about them and to specify how it is used unless an exemption is raised. Likewise, members have the right to check the personal and special category data that the Club holds about them and request it altered, amended or deleted if found to be incorrect or not accurate. The Club also recognises any members right to request that the Club's processing of their data ceases or changes and that permission previously granted can be withdrawn.

Special Category Data

In addition to personal data it is recognised that the Club might have to hold medical information on members who participate in sport for their own safety and welfare when participating in their chosen sport or using some of the Clubs facilities. This Information will be held in order to provide appropriate engagement and aid or assistance to the member if so required. The Club will justify its collection of this data and use of this data under Article 9(2)(a) of the GDPR:

The data subject (club member) has given explicit consent to the processing of those personal data for one or more specified purposes, except where Union or Member State law provide that the prohibition referred to in paragraph 1 may not be lifted by the data subject.



Luctonians Sports Club

Special Category Data continued

The specified purpose of in this instance is the health and safety of the club member. Explicit consent will be recorded. It is also recognised that other special arrangements will be made as some of these club members will be children and so subject to the additional regulation that apply to them. For GDPR a child is some under the age of 16 years. This is covered in the Privacy Policy and GDPR's Children Policy of the Club.

This policy should be read in conjunction with other data protection Policies of the Club.

Any question about this Policy should be directed to the Club's data protection officer:
dpo@luctonians.co.uk

12th March 2018