



# Luctonians Sports Club Ltd & Luctonians Ltd

## Privacy Notice

This **privacy notice** is issued by Luctonians Sports Club Ltd incorporating Luctonians Ltd and is compiled in accordance with the General Data Protection Regulations (GDPR).

Luctonians Sports Club Ltd and its incorporated subsidiary Luctonians Ltd (Hence referred as the Club) is set up in accordance with The Rules of Luctonians Sports Club Ltd rule 3 Objects

The objects for which the Club is established are:

To promote community participation in healthy recreation by providing facilities for playing rugby union football and other sports (facilities means land, buildings, equipment and organising sporting activities);

To provide and assist in providing facilities for sport, recreation or other leisure time occupation of such persons who have need for such facilities because 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

To advance the education of children and young people through such means as the Directors think fit in accordance with the law of charity.

The Club will use Legitimate Interests as its lawful authority to collect personal data and special category data so it can meet the objectives of the Club as stated.

In addition to the objectives above the Club is required to collect Personal Data on behalf of Constituent Bodies and Sporting Authorities so that you are able to be registered and take part in your sport. In these cases, your chosen Sport will also have a Privacy Policy which will inform you as to why they want your data and what they will do with it. You should make yourself aware of these policies as well.

The aim of this notice is to inform Members, employees and any other person who the Club is likely to collect personal and or special category.

For the purpose of GDPR personal data and special category data is:

### **Personal data**

Personal data or information can mean any information that is personal to you and from which someone could identify who you are or where you are. This is easily recognisable when you consider your name and address, but may be not so easy when we talk about other things like photographs or videos that you might appear in while playing or enjoying the facilities at the Club or locations data that might be linked with your use of our websites or social media.

Personal Data will also be such information as Club Membership Numbers that will be automatically produced by our systems to identify you and cookies that might be placed on your personal computer as a result of your use of our websites.



# Luctonians Sports Club Ltd & Luctonians Ltd

The GDPR applies to both automated personal data and to manual filing systems where personal data is accessible according to specific criteria. This could include chronologically ordered sets of manual records containing personal data, such as coaching records.

## **Sensitive personal data (Special Category Data)**

The GDPR refers to sensitive personal data as “special categories of personal data” which the processing of personal data reveals racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation.

Personal data relating to criminal convictions and offences are not included, (but similar extra safeguards apply to its processing detailed in Article 10 of GDPR). This data we are unlikely to know of unless it is a result of a DBS check and is dealt with in our Policy on Data Baring Service Checks.

## **Processing Data**

To achieve the objectives of the Club and expectations of the Membership, the Club will need to collect personal data so we can identify who our members are, enable the Club to communicate with them across various mediums and meet the expectations of the membership as a whole or parts thereof. In some cases, we will need to collect special category data, such as medical information in order that members can participate in chosen sports and activities at the club safely and so the Club or its representatives can respond accordingly in needs of injury or emergency. Next of kin and their contact details will similarly be collected for the same reason. This information if only collected as next of kin reference is subject to the same level of rights and protection as any other personal data collected

At all times the Club recognises the need to keep personal data and special category data secure and strictly private. We will not share any personal data or special category data with a third party unless there is expressed consent by the data subject or a data subject's legal guardian in respect of a young person under the age of 16 years. Any Personal or Special Category Data that is lawfully required to be shared will be done so, sharing the minimal amount of data necessary to achieve the requisite requirement.

For example, all playing members will agree that where personal data is required by their chosen sport's Constituent Body or Sporting Authority to register them as a participant in their chosen sport this information will be shared.

Likewise, special category personal data (Medical Information) that is held by the Club in relation to a member who is actively participating in their chosen sport and as result an injury occurs, relevant medical information will be shared with third party medical professionals who are attending to the injury or illness if it is relevant.



# Luctonians Sports Club Ltd & Luctonians Ltd

Other times we will share personal information is when we are required to do so by the legitimate request, on receipt of written authorities, from recognised organisations as the Police or Government Authorities.

The Club recognises that Photographic and Videography are forms of personal data. The Club reserves the right to collect this data and use it in circumstances to help a member benefit from analysis of this data or to celebrate the ethos and spirit of sport for which the Club exists. The Club also recognises the individual members' right to state how such data is processed and used as described below;

The Club recognises that as an individual you have the following rights in respect of personal data and or special category data the Club holds about you:

1. The Right to be informed – This notice is complying with this right and informs you of how we will use your personal data.
2. The Right of Access – The GDPR gives you as an individual the right to know what data we possess about you and to inspect that data.
3. The Right of Rectification – This means that you have the right to ask the Club to amend any data held that is not correct.
4. The Right of Erasure – This means that any data we hold you can request it to be deleted.
5. The Right to Restrict Processing – This means you can request that we do not use your data in certain ways or for certain purposes.
6. The Right to Data Portability – This means if you request a copy of the personal data that the Club holds on you it must be supplied in format that you can access and read.
7. The Right to Object – This means the Club must stop processing your personal data if you request it.
8. Rights to automated decision making including profiling – This right will not be relevant as the Club does not conducted automated decision making or profiling.

You also have the right of appeal and complaint to the Information Commissioner's Office if you believe we are not working correctly with the GDPR.

If you want more information on your rights please visit the Information Commissioner Office website: <https://ico.org.uk> or the Clubs Data Protection Officer via email, [dpo@luctonians.co.uk](mailto:dpo@luctonians.co.uk)

## **Retention of Personal and Special Category Data**

The Club will retain any Personal or Special Category Data for only as long as necessary and once the data is no longer required it will be securely destroyed or permanently and securely erased from all of the Club's systems and files.



# Luctonians Sports Club Ltd & Luctonians Ltd

Personal Data that identifies current members and related membership data will be kept up dated as necessary for the period that the member continues active membership of the Club. When a member's membership is allowed to elapse then personal data will be kept about that membership for 3 years before it is subject to deletion.

In the case of Special Category Data; this data will be immediately deleted from the Clubs systems and files when it no longer becomes relevant.

In respect of specific permission granted for specific use of personal data this will be kept for as long as the use of that data is on-going. For example, if you agree to take part in a promotional video for the Club and sign a consent notice we will keep that consent for as long as necessary.

## **Security of Personal and Special Category Data**

The Club takes very seriously the expectation of members that their personal data and special category data is to be kept private and secure.

In order to meet these expectations, the Club has produced a Data Security Policy and undertakes to make sure that all persons employed by the Club or by virtue of their volunteer role in the Club receive training in the subject of Data Security and the requirements of the Club's Data Security Policy.

## **Marketing data**

The Club under no circumstances will share your personal data with a third-party marketing organisation. Occasionally we might want to pass on to you information that has been supplied to us by sponsors or associates of the Club that we feel you as an individual might have an interest in. When signing up to membership this particular question will be asked of you and you will have to specifically select that option to benefit from such information. Likewise, the Club will promote events that it is hosting and again at the time of signing up to membership you will have to opt in to receive such information.

## **Website, other third-party applications and Cookies**

The Club acknowledges that to supply its services to its members it has to employ the use of third party digital media such as website hosting and maintenance, digital membership application and recording, and social media platforms. Where such application are supplied and maintained by third parties the third parties will display their own privacy notice and explanation of how they handle such data on the Clubs behalf. They will also be responsible for explaining their cookie policy and how they use cookies. The Club acknowledges that they are still the data controllers of the information collected by third parties on the Clubs behalf.

The Club will also make sure that all third parties used to provide website, social media facilities, or other relevant electronic data for the Club will do so in conjunction with the Clubs Policy on Photography, Videography and Electronic Communications.



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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](mailto:dpo@luctonians.co.uk)

24<sup>th</sup> April 2018