

SHIRLEY PARK BOWLING CLUB LTD.

PRIVACY NOTICE 2022

Shirley Park Bowling Club Limited ('the Club') respects your right to privacy. We have produced this notice to explain what personal data we collect and hold, and how we use it. We also want to make you aware of your rights under the UK General Data Protection Regulation (UK GDPR). Our aim is to be fair and transparent about the use of personal data.

WHAT PERSONAL DATA WE HOLD OR MAY HOLD

We hold the following personal information on all members:

- Name
- Gender
- Postal address
- Telephone number(s)
- Email address
- Previous or other existing flat green bowling club
- Date of birth if you are under 18, or you wish to enter an age related internal/external competition; or you are a member of the General Committee.

Certain Club officers may need to provide information relevant to holding their post.

You may also provide more sensitive personal information that is classified as Special Category Data. This could include information such as that concerning your health, any disability, race or ethnicity.

HOW WE COLLECT YOUR PERSONAL DATA

All data is obtained directly from you. This is mainly at the point of your initial membership application, but you must tell the club about any changes to your details. You may also be included in photographs of Club activities.

HOW WE USE YOUR PERSONAL DATA

The UK GDPR requires organisations to justify why they use personal data, and to specify which of the six 'Lawful Basis for Processing' they are assigning to each task; i.e.: consent, contract, legal obligation, vital interests, public task, or legitimate interests.

Membership and Club management (¹ Contract, ² Legal Obligation or ³ Legitimate Interests)

- registering and administering membership (including affiliation with the sport's governing bodies and associations) ^{1,3}
- informing you of statutory items, such as AGM notices ²
- providing members with general information about the Club's operation and activities ³
- to enable communication with members who are volunteering or have particular responsibilities (e.g. unlocking/locking, bar and catering duties). This includes listing members' phone numbers in the Club handbook and on the phone cupboard phone list ³.
- providing the contact information of Club officers to members and relevant external organisations, on the website and in other publicity and information³
- producing the Club's statutory register of members and officers, and their contact details; and providing information about General Committee officers to the Financial Conduct Authority ² and, if required, to the Club's Insurers ¹.

Bowling, matches and competitions (Legitimate Interests)

- sharing contact details with club captains, vice-captains, or team managers to help manage team selection for matches
- sharing contact details with opponents and external organisations to help arrange competitions
- sharing contact details with internal league organisers
- sharing phone numbers with other members, including in the Club handbook and on the telephone cupboard phone list, to enable informal games and competitions to be arranged
- providing you with relevant information about bowling, including Club and member's news; and information from external bowling organisations

You can ask for your details not to be shared, but this would make it difficult for you to be included in matches and competitions.

Social activities (Legitimate Interests)

- providing you with information on Club social events and activities
- providing you with information on Club and member's news

You can choose not to have your details used for this purpose by informing the Club in writing.

Use of photographs to publicise and promote the Club's activities (Legitimate Interests)

Photographs may be taken at any bowling or social activity at the Club or elsewhere. Such photographs (possibly identifying the participants) may be posted in the clubhouse, on the Club's website or its social media (or Bowls Surrey social media) or included in the handbook.

Photographs (without identifying the participants) may be used in posters, flyers or advertisements for the Club.

You may decline to have your photograph taken or ask for photographs of you not to be used at all or for a particular purpose.

Children and vulnerable adults (Legitimate Interests or Consent)

We may collect additional information on children/vulnerable adults, parents or carers, and/ legal guardians in line with our Safeguarding Policy. We never disclose any details or use a child's photograph without the prior consent of the responsible person. Any information relating to the health of a member would be Special Category Data subject to explicit consent (see below)

Special Category Data

Special category data is sensitive personal information that needs more protection. If the Club holds and processes your data it will be on the basis that you have given your explicit consent (in accordance with UK GDPR Article 9). The lawful basis for processing is also Consent.

Health information

If you think we need to know, you should provide us with information about your physical or mental health (including any injuries or disabilities), and emergency contact details. We may use the information to discuss with you:

- your fitness to participate in particular Club activities
- what action may be reasonably necessary to ensure your health and safety during your participation in Club activities
- the need to provide relevant information (with your consent) to any officers or members of the Club or other persons

Equal opportunities monitoring

You may provide information for equal opportunities monitoring of the sport by Bowls England, such as race, ethnicity, or disability.

WHO WE SHARE YOUR PERSONAL DATA WITH EXTERNALLY

If you have joined as a playing member, we will forward your name, and contact information if required, to the following organisations. This is to validate your affiliation to the respective associations and Bowls England:

- Bowls Surrey (SCBA - Surrey County Bowling Association and SCWBA - Surrey County Women's Bowling Association); which forwards affiliation information to Bowls England.
- Borough of Croydon Bowling Association (BCBA)

If you enter competitions organised by Bowls Surrey, Bowls England or BCBA, we will need to provide them with necessary contact information (which could include address and/or phone numbers and/or email address) so that they can contact you and enable matches to be organised between competitors. If you enter age related competitions, we must provide your date of birth.

If you apply and we enter you for coaching, marking or other courses, such as those organised by Bowls Surrey or ASBC (the Association of Surrey Bowling Coaches) we will need to provide the necessary contact information.

If you are a member of the General Committee, we need to give some of your details (including year and month of birth) to the Financial Conduct Authority (FCA) when the Club submits its annual return. We will also share additional contact information for certain Club officers with Bowls Surrey, Bowls England, the BCBA and relevant bowling leagues.

We may provide equal opportunity information to Bowls England or other organisations, for monitoring purposes.

For further information of how your data is used by these organisations, please refer to their Privacy Notices.

We do not share your personal data outside of the UK.

HOW WE STORE YOUR PERSONAL DATA

- A. Completed application forms of members are kept as a hard copy.
- B. There are paper registers of Club members and officers, and their contact details and shareholding, as required by Section 30 of the Co-operative and Community Benefit Societies Act 2014
- C. All personal information we hold is also kept on an encrypted password protected spreadsheet held by the Club Secretary and contact information is shared with committee members/coaches as appropriate.
- D. Email addresses are also held on a computer email application, in contact and distribution lists, by the Club Secretary and other officers where necessary.

A and B are kept in the Club's office which is locked when not in use to protect against unauthorised access, disclosure, copying, use, or modification. The clubhouse is protected by a monitored alarm system outside of the club's hours of business.

C and D are stored on off site computers which are protected by antivirus software to safeguard against loss or theft of your personal information.

HOW LONG WE KEEP YOUR PERSONAL DATA

We will hold your personal data for as long as you are a member of the Club. The data stored is reviewed annually. Old and incorrect data is deleted from the system.

YOUR RIGHTS TO CONTROL YOUR PERSONAL DATA

The UK GDPR provides you with a number of rights over your personal data. At any time, you can:

- request information about how the Club handles your personal data.
- request your details to be updated or deleted.
- submit a 'Subject Access Request' (SAR), which will require the Club to provide you with specific details about how and where your details have been used.
- restrict or object to the way your details are used, such as opting out of the Club's communications.

If you are providing us with details of next of kin, family members and emergency contacts they have a right to know and to be aware of what personal information we hold about them, how we collect it and how we use and may share that information. Please share this privacy notice with them. They also have the same rights as you.

AVAILABILITY, AND CHANGES TO THIS NOTICE

This notice is available in the Shirley Park Bowling Club Data Protection Binder in the club office; and from the Secretary. The notice may change from time to time. If we make any material changes we will make members aware of this via email, at appropriate meetings and on notice boards.

HOW TO COMPLAIN

If you are not happy with the way the Club has handled your data privacy, you can complain to the Information Commissioner's Office (ICO). You can submit a complaint via <https://ico.org.uk/concerns/> or call 0303 123 1113.

CONTACT US

If you have any questions about the Club's privacy policy or practices, please contact the Club Secretary at Shirley Park Bowling Club Ltd., Rear Of 21-25 Mapledale Avenue, Croydon CR0 5TG.