

Data Protection Policy

Cheam Squash Club

Last updated	29/08/2018
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Definitions

The Club	Cheam Squash Club
GDPR	means the General Data Protection Regulation.
Responsible Person(s)	Chairman, Membership Sec & Club Sec (Named on the public website)
Register of Systems	means a register of all systems or contexts in which personal data is processed by Cheam Squash Club.

1. Data protection principles

Cheam Squash is committed to processing data in accordance with its responsibilities under the GDPR.

Article 5 of the GDPR requires that personal data shall be:

- a. processed lawfully, fairly and in a transparent manner in relation to individuals;
- b. collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be considered to be incompatible with the initial purposes;
- c. adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
- d. accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay;
- e. kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes subject to implementation of the appropriate technical and organisational measures required by the GDPR in order to safeguard the rights and freedoms of individuals; and
- f. processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.”

2. General provisions

- a. This policy applies to all personal data processed by Cheam Squash Club.
- b. The Responsible Person(s) shall take responsibility for the Cheam Squash Club's ongoing compliance with this policy.
- c. This policy shall be reviewed at least annually.

3. Lawful, fair and transparent processing

- a. To ensure its processing of data is lawful, fair and transparent, Cheam Squash shall maintain a Register of Systems (See Appendix-A)
- b. The Register of Systems shall be reviewed at least annually (within this document – See Appendix-A)
- c. Individuals have the right to access their personal data and any such requests made to Cheam Squash shall be dealt with in a timely manner (within 30 days of request)

4. Lawful purposes

- a. All data processed by Cheam Squash must be done on one of the following lawful bases: consent, contract, legal obligation, vital interests or legitimate interests
- b. Where consent is relied upon as a lawful basis for processing data, evidence of opt-in consent shall be kept with the personal data (handled within the registered systems (Appendix-A))
- c. Where communications are sent to individuals based on their consent, the option for the individual to revoke their consent should be clearly available and systems should be in place to ensure such revocation is reflected accurately in the Cheam Squash systems - this is handled within the MyCourts system

5. Data minimisation

- a. Cheam Squash Club shall ensure that personal data utilised is adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.

6. Accuracy

- a. Cheam Squash Club shall take reasonable steps to ensure personal data is accurate, however it is the responsibility of the members to inform the club of changes to circumstance
- b. Where necessary for the lawful basis on which data is processed, steps shall be put in place to ensure that personal data is kept up to date.
- c. The system of record used for Cheam Squash Club is MyCourts -> All data shall be held here

7. Removal of data

- a. Personal data appropriate to membership shall be kept on the system of record for the duration of membership of the club
- b. When a member leaves and is marked as "inactive" they can request immediate removal of all their data. Otherwise data will be retained to facilitate returning members.
- c. Periodically the Club will delete all inactive members data. This will typically be done annually, approximately two years after the end of the membership year in which they were active.

8. Security

- a. Cheam Squash Club shall ensure that personal data is stored securely using modern software that is kept-up-to-date.
- b. Access to personal data shall be limited to personnel who need access and appropriate security

should be in place to avoid unauthorised sharing of information.

9. Breach

In the event of a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data, Cheam Squash Club shall promptly assess the risk to people's rights and freedoms and if appropriate report this breach to the members affected and appropriate authorities & regulators

END OF POLICY

APPENDIX-A – REGISTRY OF SYSTEMS

System Name	Purpose	Context to Cheam Squash	Notes
MyCourts	Handles membership and is the only system of record to maintain the club's membership	System of record for membership, user system to book courts, Golden Source of information	The one point of administration for ALL members
Cheam Squash Website: www.cheamsquashclub.co.uk	Website for the club	Club for advertisement	No personal data / state is held here