



DATA PROTECTION POLICY

REVIEWED MAY 2018

NEXT REVIEW DUE APRIL 2019

DATA PROTECTION POLICY

BADMINTONscotland is registered with the Information Commissioner and complies with data protection principles under the General Data Protection Regulation (GDPR). This policy document has been written in connection with the GDPR which takes effect on 25 May 2018, and related UK data protection legislation.

Scottish Badminton Union, *trading as BADMINTONscotland* is a 'data controller' and as such determines the purpose for which, and the manner in which, any personal data are, or are to be, processed.

BADMINTONscotland must ensure that they:-

1. **PROCESSING DATA FAIRLY, LAWFULLY AND IN A TRANSPARENT MANNER**
***BADMINTONscotland* will ensure that all data is processed fairly, lawfully and transparently as follows:**
 - a. have legitimate grounds for collecting and using the personal data;
 - b. not use the data in ways that have unjustified adverse effects on the individuals concerned;
 - c. be transparent about how we intend to use the data, and give individuals appropriate privacy notices when collecting their personal data;
 - d. handle people's personal data only in ways they would reasonably expect; and
 - e. make sure we do not do anything unlawful with the data.

BADMINTONscotland will put its name on all paperwork and will state what the information is to be used for, and if necessary who will receive data.

BADMINTONscotland will place its Privacy Notice on the official website, with a link to the Privacy Notice also placed within its Cookies Policy checkbox within individual web pages. For the purposes of GDPR compliance, **BADMINTONscotland** staff will place a link to the Privacy Notice at the bottom of all outgoing emails, for a period of six months from the implementation date of GDPR.

The Privacy Notice will be written in plain English and will be specific for various stakeholders e.g. volunteers, members, players, spectators etc.

2. **HOLD DATA ONLY FOR SPECIFIC, EXPLICIT AND LEGITIMATE PURPOSES**
***BADMINTONscotland* will ensure that personal data shall be obtained only for one or more specified and lawful purposes, and shall not be further processed in any manner incompatible with that purpose or those purposes. We will do this as follows:**
 - a. be clear from the outset about why we are collecting personal data and what we intend to do with it;
 - b. comply with the Act's fair processing requirements – including the duty to give privacy notices to individuals when collecting their personal data;
 - c. comply with what the Act says about notifying the Information Commissioner; and
 - d. ensure that if we wish to use or disclose the personal data for any purpose that is additional to or different from the originally specified purpose, the new use or disclosure is fair and legitimate in all the circumstances.

BADMINTONscotland will ensure that data to be used for direct marketing purposes will be done with the permission of the data subjects and the third party will be asked to sign a declaration form stating how data is to be used. In addition they will be asked to agree not to copy the data for further use.

3. **DATA HELD IS RELEVANT, ADEQUATE AND LIMITED AS NECESSARY FOR ITS PURPOSE**

BADMINTONscotland will ensure that personal data shall be adequate, relevant and limited to what is necessary in relation to the purpose or purposes for which they are processed. We will ensure that:

- a. we hold personal data about an individual that is sufficient for the purpose we are holding it for in relation to that individual; and
- b. we do not hold more information than we need for that purpose.

BADMINTONscotland will monitor the quantity and type of data held for our business purposes and ensure that we hold neither too much nor too little data in respect of the individuals about whom data is held. We will ensure that only relevant data is held, and that data subjects are aware of and have consented to their data being held where appropriate.

4. **DATA HELD IS ACCURATE AND KEPT UP TO DATE**

BADMINTONscotland shall ensure that personal data shall be accurate and, where necessary, kept up to date, by ensuring we:

- a. take reasonable steps to ensure the accuracy of any personal data we obtain;
- b. ensure that the source of any personal data is clear;
- c. carefully consider any challenges to the accuracy of information; and
- d. consider whether it is necessary to update the information.

All errors will be rectified as soon as ***BADMINTONscotland*** becomes aware of an error. If this error constitutes a breach of security, ***BADMINTONscotland*** will follow the GDPR rules in respect of reporting the breach to the ICO and informing those affected by the breach.

BADMINTONscotland will annually invite its stakeholders (e.g. members, volunteers, players etc.) to review their data for accuracy where relevant. Required amendments will be made at that point.

BADMINTONscotland will update data information as required, on an on-going basis e.g. staff salary details, email addresses.

BADMINTONscotland will amend data as requested at any time, by stakeholders.

BADMINTONscotland will erase data which is inaccurate or out of date where rectification is inappropriate or not possible.

5. **DATA RETENTION**

BADMINTONscotland will ensure that data is not kept longer than necessary, by:

- a. reviewing the length of time we keep personal data;
- b. considering the purpose or purposes we hold the information for in deciding whether (and for how long) to retain it;
- c. securely deleting information that is no longer needed for this purpose or these purposes;
- d. updating, archiving or securely deleting information if it goes out of date.
- e. Implementing appropriate technical and organisation measures to safeguard the personal data and the rights and freedoms of individuals, including keeping data in a form which limits the identification of data subjects where the data is no longer necessary for the intended purposes.

For legal reasons all financial data will be held for seven years and then destroyed.

Minutes of ***BADMINTONscotland*** meetings form part of ***BADMINTONscotland***'s history and will be retained indefinitely. ***BADMINTONscotland*** meetings may be recorded to assist the minute taker. The recording of such meetings will be erased following the approval of the minutes at the next meeting, unless the minutes are under dispute.

BADMINTONscotland will ensure that there are clear procedures for the deletion and archiving of data. Where data is to be deleted, the data subjects must be informed that this is an irretrievable action. Equally, where data will be archived, the data subject must be informed of the content, purpose and retention timescale for the archived data; and where appropriate consent must also be sought.

All personal data pertaining to other stakeholders (e.g. affiliated members, coaches, volunteers, staff, spectators, suppliers etc.) will be deleted either when the information becomes irrelevant, or upon request of the stakeholder.

Where **BADMINTONscotland** has shared information (e.g. with a volunteer team leader), any data that becomes irrelevant or where there has been a request to remove it, **BADMINTONscotland** will communicate this with the person/s with which the data has been shared.

6. RIGHTS

Personal data shall be processed in accordance with the rights of data subjects under this Act. We adhere to the following rights:

- a. a right of access to a copy of the information comprised in their personal data;
- b. a right to object to processing that is likely to cause or is causing damage or distress;
- c. a right to prevent processing for direct marketing;
- d. a right to object to decisions being taken by automated means;
- e. a right in certain circumstances to have inaccurate personal data rectified, blocked, erased or destroyed; and
- f. a right to claim compensation for damages caused by a breach of the Act.

The rights outlined above comprise the GDPR-specific rights of individuals below:

- a. the right to be informed;
- b. the right of access;
- c. the right to rectification;
- d. the right to erasure;
- e. the right to restrict processing;
- f. the right to data portability;
- g. the right to object;
- h. the right not to be subject to automated decision-making including profiling.

BADMINTONscotland will respect and respond promptly to requests, concerns and objections made by stakeholders. **BADMINTONscotland** will not levy a charge unless a request is considered to be manifestly unfounded or excessive. A reasonable fee may be levied for multiple requests.

7. DATA SECURITY

BADMINTONscotland must ensure that appropriate technical and organisational measures shall be taken against unauthorised or unlawful processing of personal data and against accidental loss or destruction of, or damage to, personal data.

The Executive Administrator is responsible for ensuring that the Security Protocols are disseminated to staff; staff are individually responsible for ensuring personal compliance with these protocols. The protocols are detailed below:

All **BADMINTONscotland** computers have a log on system, which allows only authorised personnel to access personal data. Passwords on all computers must be changed frequently (e.g. monthly). Sensitive data must be stored using a separate password-protected file (electronic version); or within a secure cabinet/drawer (paper version).

All financial and child protection data must be stored using a separate password-protected file (electronic version); or within a secure cabinet/drawer (paper version) and can only be accessed by the Chief Executive or nominated member of staff.

When **BADMINTONscotland** staff are using laptop computers out of the office care should always be taken to ensure that personal and sensitive data on screen is not visible to strangers.

BADMINTONscotland employs a 'clear desk' policy. When away from their desk, staff must ensure that any personal or sensitive data is removed and securely stored. When holding meetings at staff desks, ensure that personal and sensitive data is not visible.

BADMINTONscotland staff must securely delete files and documents that are no longer required for processing. Electronic files must be deleted from all devices; paper versions of personal and sensitive data must be shredded or uplifted as confidential waste.

BADMINTONscotland staff must ensure that all information gained in the course of their employment relating to the company and/or its clients, customers or suppliers remains confidential both during and after their employment with the company.

BADMINTONscotland automatically backs-up all data held. The back-up, which is password protected and AES encrypted, are held securely on the premises in a fire-proof safe.

BADMINTONscotland offices are locked and alarmed out-with office hours and only staff and cleaners have keys to access the building.

8. INTERNATIONAL TRANSFER OF DATA

Personal data held by **BADMINTONscotland** will not be transferred 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.