# TEMPLATE DATA PROTECTION POLICY

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# About this Policy

This policy explains when and why we collect personal information about our members, volunteers and coaches, how we use it and how we keep it secure and your rights in relation to it.

We may collect, use and store your personal data, as described in this Data Protection Policy and as described when we collect data from you.

We reserve the right to amend this Data Protection Policy from time to time without prior notice. You are advised to check our website [*insert web address*] or our Club noticeboard regularly for any amendments (but amendments will not be made retrospectively).

We will always comply with the General Data Protection Regulation (**GDPR**) when dealing with your personal data. Further details on the GDPR can be found at the website for the Information Commissioner (www.ico.gov.uk). For the purposes of the GDPR, we will be the “controller” of all personal data we hold about you.

# Who are we?

We are [*insert club name*]. We can be contacted at [*insert address, e-mail address and phone number].*

# What information we collect and why. [*Insert your data list*] – below is an example only

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| **WHAT** | **SOURCE** | **SHARED WITH / PROCESSED BY** | **HOW USED** | **DURATION KEPT** | **HOW DELETED** |
| Name, address, sex, email address | Adult members (players) | Badminton Scotland; club committee | Affiliation info for BadScot; to communicate with members – share info & advertise events | As long as they are affiliated to club. Deleted after one year of non-affiliation | Electronically deleted. Paper copies either redacted or shredded. |
| Name, address, sex, parent/carer contact details, emergency contact details, DOB, medical conditions | Junior members (players) | Number and sex of juniors shared with Badminton Scotland; full details shared with lead coach of junior section | Affiliation info for BadScot; pastoral information for lead coach. | As long as they are affiliated to club. Deleted after one year of non-affiliation | Electronically deleted. Paper copies either redacted or shredded. |
| Name and record of attendance | Junior members (players) | Committee members if required. | E.g. for selection purposes, if selection criteria states that junior players require a minimum attendance rate. | One season | Shredded |
| Photos of players | Event organisation team (committee/volunteers) | Club website; local newspaper; social media; club archive | Results and news items; archive for posterity | Indefinite, or upon request | Electronically deleted. |
| Junior Clubs or Protected Adults clubs: PVG details:  Name, PVG number, role at club, type of PVG, date of PVG | Disclosure Scotland via Badminton Scotland (or another Intermediary Body) | Badminton Scotland (or another Intermediary Body) share PVG information with the club.  Club will share any changes reported on individual’s suitability for work with Badminton Scotland | Recruitment decision | For as long as individual is working at the club | PVG certificate is processed and shredded by Badminton Scotland. If individual leaves the club, club electronically deletes data. |

1. **How we protect your personal data**
   1. We have implemented generally accepted standards of technology and operational security in order to protect personal data from loss, misuse, or unauthorised alteration or destruction.
   2. Please note however that where you are transmitting information to us over the internet this can never be guaranteed to be 100% secure.
   3. For any payments that we take from you online, we will use a recognised online secure payment system.
   4. We will notify you promptly in the event of any breach of your personal data that might expose you to serious risk.
2. **who else has access to the information you provide us?**

5.1 We will never sell your personal data. We will not share your personal data with any third parties without your prior consent (which you are free to withhold) except where we are required to do so by law or as set out in the table above or in paragraphs 5.2 and 5.3 below.

5.2 We may pass your personal data to third parties who are service providers, agents and subcontractors to us for the purposes of completing tasks and providing services to you on our behalf (e.g. to print newsletters and send you mailings). We do this for the purpose of our legitimate interests in operating the Club. However, we disclose only the personal data that is necessary for the third party to deliver the service and we have a contract in place that requires them to keep your information secure and not to use it for their own purposes. It is possible that third parties may themselves engage others (sub- processors) to process your data. Where this is the case third parties will be required to have contractual arrangements with their sub-processor(s) that ensure your information is kept secure and not used for their own purposes.

* 1. We may also pass your personal data to Badminton Scotland for the purposes of carrying out surveys when it is in the legitimate interest of the club and Badminton Scotland to do so. Badminton Scotland may use third parties to carry out the surveys but disclose only the personal data that is necessary for the third party to do so and will have a contract in place that require the third party to keep your information secure and not to use it for their own purposes.

# 6 How long do we keep your information?

6.1 We will hold your personal data on our systems for as long as you are a member of the Club and for as long afterwards as it is in the Clubs’ legitimate interest to do so or for as long as is necessary to comply with our legal obligations. We will review your personal data every year to establish whether we are still entitled to process it. If we decide that we are not entitled to do so, we will stop processing your personal data except that we will retain your personal data in an archived form in order to be able to comply with future legal obligations e.g. compliance with tax requirements and exemptions, and the establishment, exercise or defence of legal claims.

6.2 We securely destroy all financial information once we have used it and no longer need it.

# 7 Your rights

7.1 You have rights under the GDPR:

* to access your personal data
* to be provided with information about how your personal data is processed
* to have your personal data corrected
* to have your personal data erased in certain circumstances
* to object to or restrict how your personal data is processed

7.2 You have the right to take any complaints about how we process your personal data to the Information Commissioner:

<https://ico.org.uk/concerns/>

0303 123 1115.

Information Commissioner's Office – Scotland

45 Melville Street  
Edinburgh  
EH3 7HL

For more details, please address any questions, comments and requests regarding our data processing practices to our [Data Protection Manager] [*insert address or e-mail address]*