

Wight Eagles Ladies FC Data Protection Policy

- 1.1 The Club collects and processes personal data. This is data we receive directly from an individual and data we may receive from other sources.
- 1.2 The Club handles personal data about current, former and prospective players and their parents or guardians, volunteers, committee members, referees, coaches, and managers and may handle personal data about sponsors, members of grant giving bodies, third parties, suppliers and any other individuals that we communicate with.
- 1.3 We recognise the need to treat all personal data in an appropriate and lawful manner, in accordance with the EU General Data Protection Regulation 2016/679 (**GDPR**).
- 1.4 Correct and lawful treatment of this data will maintain confidence in the Club and protect the rights of players and any other individuals associated with it. This policy sets out our data protection responsibilities and highlights the obligations of the Club, including the obligations of our committee members, volunteers, members, and any other contractor or legal or natural individual or organisation acting for or on behalf of the Club.
- 1.5 The management committee will be responsible for ensuring compliance with this policy. Any questions about this policy or data protection concerns should be referred to the committee.
- 1.6 We process personal data for administrative and management purposes. Our purpose for holding this personal data is to be able to contact relevant individuals on Club business and our legal basis for processing personal data in this way is the contractual relationship we have with members of the Club. We will keep this data for up to 12 months after the end of players' official relationship with the Club, unless required otherwise by law or regulatory requirements. Where people do not provide their personal data for this purpose, they will not be able to carry out their role or take part in the activities of the Club.

2. Responsibilities of committee members and volunteers

- 2.1 To ensure our compliance with GDPR, Club committee members and volunteers will comply with the terms of this policy by:
 - 2.1.1 ensuring that they only process personal data for the purposes for which we have collected it;
 - 2.1.2 if they are asked to correct an individual's personal data, making the relevant updates on our records and systems;

- 2.1.3 complying with the retention period set out in this policy and ensuring information is deleted/destroyed securely;
- 2.1.4 treating all personal data as confidential and ensuring its safe storage;
- 2.1.5 consulting the Club Secretary or management committee about sharing personal information with a third party other than with St John's Ambulance or medical staff in the case of an injury;
- 2.1.6 if they receive a subject access request (or they think somebody is making a subject access request for access to the information we hold on them), informing the Secretary as soon as possible because there are have strict timelines in which to comply;
- 2.1.7 if they think there has been a data breach (for example they have lost personal data or a personal device which contains personal data), informing the Secretary or the management committee.

3. Data protection principles

- 3.1 Club committee members and volunteers will do their best to ensure that personal data is:
 - 3.1.1 processed lawfully, fairly and in a transparent manner;
 - 3.1.2 collected for only specified, explicit and legitimate purposes;
 - 3.1.3 adequate, relevant and limited to what is necessary for the purpose(s) for which it is processed;
 - 3.1.4 accurate and, where necessary, kept up to date;
 - 3.1.5 kept in a form which permits identification of individuals for no longer than is necessary for the purpose(s) for which it is processed;
 - 3.1.6 processed in a manner that ensures its security by appropriate technical and organisational measures to protect against unauthorised or unlawful processing and against accidental loss, destruction or damage.

4. Consent

- 4.1 One of the lawful bases on which we may be processing data is the individual's consent.
- 4.2 An individual consents to us processing their personal data if they clearly indicate specific and informed agreement, either by a statement or positive action.

4.3 Where a prospective member of the Club completes an application form to join the Club and we inform their parent/guardian, we will take that as consent to use the personal data provided for the purposes of their membership of and participation in the Club.

4.4 Individuals are able to withdraw their consent at any time and withdrawal will be promptly honoured.

5. **Notifying individuals**

5.1 Where we collect personal data directly from individuals, we will inform them or their parents/guardians about this policy and make it available through our website.

6. **Accurate data**

6.1 We will ensure that the personal data we hold is accurate and kept up to date. We will take all reasonable steps to destroy or amend inaccurate or out-of-date data.

7. **Timely processing**

7.1 We will not keep personal data longer than is necessary for the purpose(s) for which they were collected. We will take all reasonable steps to destroy or delete data which is no longer required.

8. **Processing in line with data subjects' rights**

8.1 As data subjects, all individuals have the right to:

8.1.1 be informed of what personal data is being processed;

8.1.2 request access to any data held about them;

8.1.3 ask to have inaccurate or incomplete data rectified;

8.1.4 be forgotten (deletion or removal of personal data);

8.1.5 restrict the sharing of data;

8.1.6 ask that photographs of an individual player or other member of the League are not shared with grant-giving bodies, included on the League's website or Facebook page or otherwise made publicly available.

8.2 Any requests regarding the above will, if applicable, be escalated to the Hampshire County Football Association for guidance.

9. **Data security**

9.1 We will take appropriate security measures against unlawful or unauthorised processing of personal data, and against the accidental loss of, or damage to, personal data.

10. Disclosure and sharing of personal information

10.1 We may share personal data we hold if we are under a duty to disclose or share an individual's personal data in order to comply with any legal obligation, or in order to enforce or apply any contract with the individual or other agreements; or to protect our rights, property, or safety of our players, other individuals associated with the Club or others.

10.2 We may share personal data with third parties or suppliers for the services they provide. This may include providing some personal data to grant-awarding bodies.

11. Reporting a personal data breach

11.1 In the case of a breach of personal data, we may need to notify the applicable regulatory body and the individual.

12. Dealing with subject access requests

12.1 Individuals may make a formal request for information we hold about them. Anyone who receives such a request should forward it to the Club Secretary. Nobody should feel bullied or pressured into disclosing personal information.

12.2 When receiving telephone enquiries, we will only disclose personal data if we have checked the caller's identity to make sure they are entitled to it.

13. Accountability

13.1 We will ensure that all members of the management committee and volunteers are aware of this policy.

14. Changes to this policy

14.1 The management committee reserves the right to change this policy at any time.

Wight Eagles Ladies FC Management Committee

January 2024