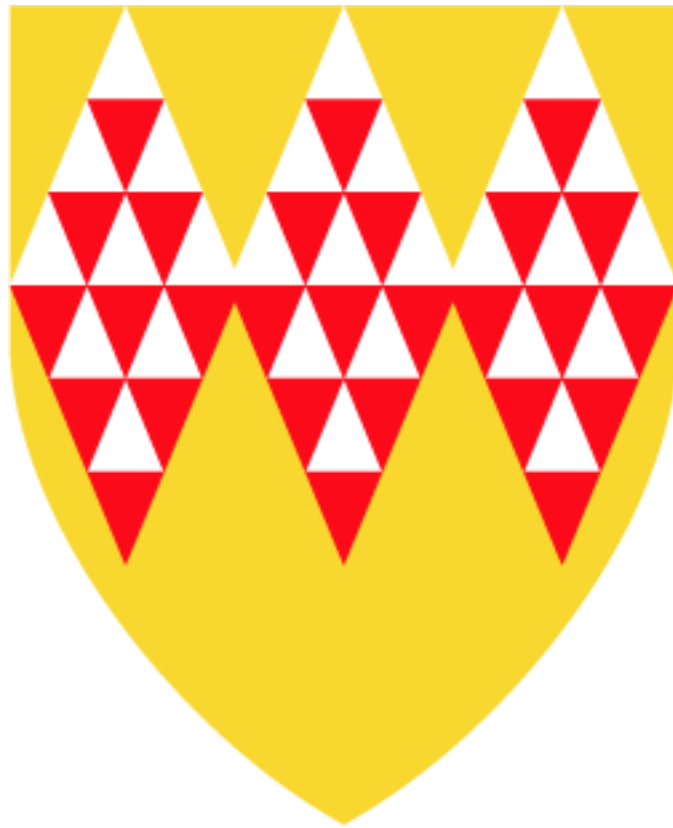


GENERAL DATA PROTECTION REGULATION - PRIVACY NOTICE



STEETON C.C.

What is the purpose of this document?

Steeton Cricket Club is committed to protecting the privacy and security of your personal information.

This privacy notice describes how we collect and use personal information about you during and after your relationship with us, in accordance with the General Data Protection Regulation (GDPR).

This privacy notice applies to all committee members, club members, vice presidents, senior players, junior players, non-member visitors whose information we collect, past players, workers, contractors and volunteers.

We do not require your Consent to process your individual data – this document will explain to you why we do not require your consent, explain the lawful ways in which we can process your information and which of those lawful ways we will use. Consent is one of six ways in which we can lawfully process your information. We only process individual data that we are entitled and justified to process and only for the purpose for which it was collected.

We recognise that we may collect, process and store sensitive health or medical data about you. The GDPR refers to this as 'Special Category Data'. We are permitted to collect, process and store this data about you under the GDPR.

Steeton Cricket Club is a "data controller". This means that we are responsible for deciding how we hold and use personal information about you. We are required under data protection legislation to notify you of the information contained in this privacy notice. We may update this notice at any time.

It is important that you read this notice, together with any other privacy notice we may provide on specific occasions when we are collecting or processing personal information about you, so that you are aware of how and why we are using such information.

Data protection principles

We will comply with data protection law. This says that the personal information we hold about you must be:

1. Used lawfully, fairly and in a transparent way.
2. Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
3. Relevant to the purposes we have told you about and limited only to those purposes.
4. Accurate and kept up to date.
5. Kept only as long as necessary for the purposes we have told you about.
6. Kept securely.

The kind of information we hold about you

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

There are "special categories" of more sensitive personal data which require a higher level of protection.

We will collect, store, and use the following categories of personal information about you:

- Personal contact details such as name, title, addresses, telephone numbers, and personal email addresses.
- Date of birth.
- Gender.
- Marital status and dependants.
- Next of kin and emergency contact information.
- Photographs and video footage
- Statistical information relating to your cricket performance, for example number of runs, wickets, catches and the records of your individual match performance.

We may also collect, store and use the following "special categories" of more sensitive personal information:

- Information about your race or ethnicity, religious beliefs, sexual orientation and political opinions.
- Information about your health including any medical condition
- Information about any allergies you suffer from together with medication required if you suffer an allergic reaction
- Rehabilitation notes and occupational therapy records.

How is your personal information collected?

We collect your data directly from our interactions with you. Our website does not collect any individual data or use cookies.

How we will lawfully use information about you

We will only use your personal information when the law allows us to. There are six lawful ways in which we can use your information under GDPR. Most commonly, we will use your personal information in the following circumstances:

1. Where we need to perform the contract we have entered into with you or are contemplating entering into a contract with you.
2. Where we need to comply with a legal obligation.
3. Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.

We may also use your personal information in the following situations, which are likely to be rare:

1. Where we need to protect your interests (or someone else's interests).
2. Where it is needed in the public interest.
3. Where we have your explicit consent.

Purposes for which we will use your personal information

We need all the categories of information in the list above primarily to allow us to function as a cricket club, therefore we need to use your personal information to **pursue our legitimate interests**. We may also have to perform any **contract** with you and to enable us to comply with **legal obligations**.

Where we use your personal information to **pursue legitimate interests** of our own or those of third parties, those interests and fundamental rights do not override those interests of you. The situations in which we will process your personal information are listed below. We have indicated in bold type above the lawful purpose or purposes for which we are processing or will process your personal information:

- Administering the relationship we have with you as a club member or player
- Contacting you concerning club fixtures and news
- Marketing club functions to you and events to you

Some of the above grounds for processing will overlap and there may be several grounds which justify our use of your personal information.

If you fail to provide personal information

If you fail to provide certain information when requested, we may not be able to perform the contract we have entered into with you or those funding your treatment or rehabilitation.

Change of purpose

We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

How we use particularly sensitive personal information

"Special categories" of particularly sensitive personal information require higher levels of protection. We need to have further justification for collecting, storing and using this type of personal information. We will process special categories of personal information in the following circumstances:

1. Where we need to carry out any legal and contractual obligations.
2. Where it is needed in the public interest, such as for equal opportunities monitoring.
3. Where it is needed to assess your fitness on health grounds.
4. Where you have an allergy and we collect details of that allergy in case of an allergic reaction and processing is necessary for the purposes of preventive medicine. This is subject to appropriate confidentiality safeguards.

Less commonly, we may process this type of information where it is needed to protect your interests (or someone else's interests) and you are not capable of giving your consent, or where you have already made the information public. We may also process such information in the course of legitimate business activities with the appropriate safeguards.

Do we need your consent?

We do not need your consent to process your information. The club has elected that it will use the lawful bases of either 'Contract' or 'Legitimate Interest' to collect, process and store your information. We do not need your consent if we use special categories of your personal information to carry out our legal contractual obligations or exercise specific rights where processing is necessary for the purposes of preventive or occupational medicine, for the assessment of the working capacity of an employee, medical diagnosis, the provision of medical treatment or the management of health or social care systems and services on the basis of Union or Member State law or pursuant to contract with a health professional.

Automated decision-making

Automated decision-making takes place when an electronic system uses personal information to make a decision without human intervention. We are allowed to use automated decision-making in the following circumstances:

1. Where we have notified you of the decision and given you 21 days to request a reconsideration.
2. Where it is necessary to perform the contract with you and appropriate measures are in place to safeguard your rights.
3. In limited circumstances, with your explicit written consent and where appropriate measures are in place to safeguard your rights.

If we make an automated decision on the basis of any particularly sensitive personal information, we must have either your explicit written consent or it must be justified in the public interest, and we must also put in place appropriate measures to safeguard your rights.

You will not be subject to decisions that will have a significant impact on you based solely on automated decision-making, unless we have a lawful basis for doing so and we have notified you.

We do not envisage that any decisions will be taken about you using automated means, however we will notify you in writing if this position changes.

Data sharing

We may have to share your data with third parties including third-party service providers.

We require third parties to respect the security of your data and to treat it in accordance with the law.

We may transfer your personal information outside the EU.

If we do, you can expect a similar degree of protection in respect of your personal information.

Why might you share my personal information with third parties?

We will share your personal information with third parties where required by law, where it is necessary to administer our relationship with you or where we have another legitimate interest in doing so.

Which third parties process my personal information?

"Third parties" includes any third-party service providers (including contractors and designated agents). The following third-party service providers process personal information about you for the following purposes:

- The Airedale and Wharfedale Cricket Club – this is necessary for our legitimate interests.

How secure is my information with third parties?

All of the above third parties are required to take appropriate security measures to protect your personal information in line with our policies. We do not allow our third-party service providers to use your personal data for their own purposes. We only permit them to process your personal data for specified purposes and in accordance with our instructions.

Data security

We have put in place measures to protect the security of your information. Details of these measures are available upon request.

Third parties will only process your personal information on our instructions and where they have agreed to treat the information confidentially and to keep it secure.

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those who have a need to know. They will only process your personal information on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

Data retention

How long will you use my information for?

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements. In some circumstances we may anonymise your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you.

We will retain your personal information for the following periods:

Senior and Junior Players – indefinitely. This is because we operate as an amateur cricket club. The club has participated in local cricket leagues since 1878. It is important for the club and the sport to retain statistical data and the records of its players. We believe we are entirely justified in retaining your information in this way, but you do have the right to ask us to either erase your data or restrict how we use your data and you may make a formal subject access request to us in this respect, details of which are provided below.

Vice Presidents, Chairmen and individuals of seniority within the club, past and present – indefinitely for the reasons set out above.

Committee members and club members – we will retain your information for 3 years from when you were last a member with the club.

Rights of access, correction, erasure, and restriction

Your duty to inform us of changes

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during your relationship with us.

Your rights in connection with personal information

Under certain circumstances, by law you have the right to:

- **Request access** to your personal information (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- **Request correction** of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- **Request erasure** of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).
- **Object to processing** of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.
- **Request the restriction of processing** of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- **Request the transfer** of your personal information to another party.

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact us. We are entitled to refuse your request to delete information or restrict processing if we have a justifiable legitimate interest.

You can opt out of receiving email communications from us where we market to you, for example provide you with details of functions and fundraisers. Please contact us if you wish to opt out.

No fee usually required

You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

Right to withdraw consent

We do not anticipate seeking your consent to collect, process or store your information, but if we did then in those limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, if you have given it, please contact us. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law. If you withdraw your consent we may not be able to continue our relationship with you.

Data protection officer

We have appointed a data protection officer (DPO) to oversee compliance with this privacy notice. If you have any questions about this privacy notice or how we handle your personal information, please contact the DPO. You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues.

Children

Under GDPR children have particular protection when anyone collects, processes or stores their information. We recognise that we are a successful cricket club running a number of junior teams. We do not offer online services to any individual, child or a child under 13 years of age. Therefore, we do not require consent from a parent to process their children's information and we adopt the same lawful bases in relation to processing children's information as we do for adults, as set out earlier in this privacy notice.

Privacy by Design, Data Audit and Data Protection Impact Assessment

The Club subscribes to the concept of 'Privacy by Design'. As a consequence, the club carried out an audit of its data, i.e. considered the individual data coming into the club, its movement around the club and its transfer out of the club. This was carried out by Hayden Tennant. Following the data audit, the club carried out a Data Protection Impact Assessment. The outcome of that assessment was that the only risks to the way in which the club processes individual data were that the club, collects allergy information and some limited health data from those individuals who suffer with allergies. It is necessary that the club stores this data which is classed as 'special category data' in case a data subject was to suffer a reaction and require treatment.

Where 'special category data' is processed the club, as well as having a lawful basis for processing individual data, must also satisfy one of the conditions set out in Article 9(2) of the GDPR or alternatively obtain explicit consent. The club consider that they do not require explicit consent to collect, process and store this data and require on condition H set out in Article 9(2) of the GDPR, i.e. processing is necessary for the purposes of preventative medicine.

Distribution of this privacy notice

The club will distribute this privacy notice to all individual data subjects whose individual data they collect, process and store. The club will attempt to distribute, so far as it can, this notice to past players and members but recognises that the GDPR provides an exemption to doing so if it would involve a disproportionate effort.

Changes to this privacy notice

We reserve the right to update this privacy notice at any time, and we will provide you with a new privacy notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.