

Heene-Woodside Short Mat Bowls Club

GDPR Policy October 2025

Introduction

1. This policy concerns the personal information (**data**) held by the Club, its security and use. The policy is written in response to the **GDPR**, in force from 25 May 2018. It defines the people involved, the data collected by the Club, how it is stored and used internally and externally, and members' rights over their data.

Use of Data

2. The Club uses this data solely for the purposes of the effective running of the Club.

Control of Data

3. The **Data Controller** for the purposes of the GDPR will be the **Club** through the Management Committee. They will be responsible for the implementation and review of this policy. Given the nature of data held and Club size, the appointment of a **Data Protection Officer** is not seen as required. Any concerns relating to data protection should be addressed to the **Club Secretary**, who will fulfil this role.

4. The **Data Processor** will be the **Club Secretary** who will administer the club's secure membership database. They will be responsible for the collection of the data, for its security, for ensuring that permission for the data to be held, used, and shared as described below is given; and for updating of club records including deletion where required.

What Data is Collected and Why

5. We collect contact and membership details to enable us properly to manage and administer your membership with us. These details include your contact details, date of birth and details of a contact in case of emergency. This information is lawfully required and collected as a standard part of your application to join or re-join our Club.

6. The table below summarises the types of data collected and the reasons for collection.

Data Collected	Reason for Collection
Name *	This is necessary for legal and insurance purposes.
Address *	Required so that club information can be sent to members who do not have an e-mail address. It also facilitates shared transport arrangements.
Phone Number *	Home and mobile numbers are requested for contact purposes.
E-mail address *	Prime means of communication with members over teams, events, general matters and for the handbook.
Date of Birth *	Day, Month and Year of birth
Date of Joining Club	To enable long-serving members to be identified and recognised.
Emergency Contact Details	In case of accident or sudden illness of a member, when at the club or an away match.

* Required data for membership of WSCSMBA and ESMBA

When is the Data Collected and Reviewed?

7. This data is captured when a member first joins the Club through a Club Membership Application form. The accuracy of the personal information will be reviewed annually when a member renews their membership.

Who Collects and Holds the Data?

8. The data is collected by the Club Secretary (the club's Data Processor). The data is held on the club's secure membership database.

Sharing Personal Data outside the Club

9. No data will be shared outside of the Club.

Member's Rights to their Personal Data

10. Each individual member has the right to view their personal data held on the Club's membership database, which they may request from the club's Data Processor. The Data Processor must supply the required data within one month and they must immediately amend or delete data when requested to do so by an individual member. No one other than a Club Data Processor has the facility to add or modify personal data. There will be no charge for such access to data. The data held on a member will be deleted within one month of notice that the member has left or is not re-joining the Club.

Breaches of Data Security

11. If at any point a breach of data security is suspected or identified, then that suspicion or fact must be reported immediately (verbally if necessary and confirmed in writing) to the Club Chair, who is responsible for investigating breaches of security, determining the resultant degree of risk and deciding on the action to be taken, reporting this at the first opportunity to the Management Committee.

12. Where a breach is likely to result in a serious risk to the rights and freedoms of individuals (say involving health or financial issues), the Club Chair has 72 hours to report the incident to the Information Commissioners Office (ICO).

13. The Club recognises that the requirements of the GDPR apply as much to paper files and records as it does to digital ones and will ensure that any paper records are similarly securely treated. As security issues are much more problematic for paper records, the Club will seek to reduce the use of paper files to the minimum possible. Specifically, membership lists containing personal data will not be displayed on notice boards or the website for public viewing.

Consent to the Holding and Use of the Data

14. On applying to join the Club, a member will be given a copy of this policy and asked to confirm that they have read and accepted it and that the Club may use the personal data in the proper pursuance of managing their relationship with the member.

15. In addition, members will be asked to consent to the publication of their name and contact details on the Club Contact Sheet for communications about club matches, administration and events.

16. The Club will seek to always use a bcc system when any e-mails are sent to multiple members.

Reviews

22. It is expected that the Club data processor will update individuals' personal information if it changes during the year. At the annual subscription renewal members will be asked to confirm the accuracy of the data held on them. At least every four years members will be asked to reconfirm their consents as described above.

I have read, understand and accept the Club's GDPR policy, and I consent to the collection and use of my contact details as described above.

Name:

Signed:

Date: