## **Wrekinsport CC Data Protection Policy**

## Version 1– May 2018

In order to run Wrekinsport Cycling Club (WSCC) effectively we will need to hold a certain amount of personal information about our members. This information will be held on a secure membership database system.

The information we will store includes:

- Your name, e-mail address and other contact details such as telephone number;
- Contact details of somebody you would like us to contact in case of emergency;
- Whether you are a member of British Cycling and if so whether you hold a racing licence.
- Details of the cycling activities you undertake with the club, including the results of any competitive or timed events.
- Details of any club kit orders you make.

Data will be stored on an electronic database system maintained by a third party. We will ensure that the supplier treats your data carefully, keeps it surely and in a way which is compliant with current data protection legislation.

You must be aware that by sharing your data with us we have to pass it on to the third party for the purposes of operating the club. Our supplier is not permitted to use your personal information in any way without you given them direct and specific consent.

In return for sharing your data with us, we promise you that:

We will only use your data for:

- establishing and maintaining membership records; and
- Keeping you informed about developments in the club (events, results, social gatherings, meetings);

From time to time we may need to share some of our data with partner organisations who administer the sport of cycling or cycling-related activities which you have or intend to undertake. This data could include:

- Your Wrekinsport membership status;
- Your attendance status at an event; and
- Any timing or result you achieved at the event.

We will not share your personal information with any other third party and we will not retain your personal information for any longer is necessary for the running of the club or for the purposes of keeping accurate records of events and competitive results.

# **Taking Part in Competitive Events**

If you take part in a competitive event, we will share the result of that event with all participants. This will include names, timings and club membership status. We may also report the results back to the event governing body or central organising committee. We may share results via email, social media, newsletter or website. By participating in a competitive event you are giving us your consent to share your information in this way. If you do not consent, do not compete.

#### Social Media

Club Members take full responsibility for posts made on social media, both in public forum and on closed members only groups. We cannot Control who posts or the content of their posts. We will however

support you by working with social media platform providers to remove inappropriate content if we spot it or when you report it to us.

We do not mandate that you contact or interact with the club via Social Media. If you choose to do so, please note that any material posted in open or private forum will be governed by the Data Protection Policy of the social media platform upon which it is posted.

### Finding out what information we hold about you.

You can ask us at any time to supply you with a copy of the data we hold about you. You can do this by sending an email titled "Subject Access Request" to <a href="mailto:secretary@wrekinsport.org.uk">secretary@wrekinsport.org.uk</a>. We will respond to you with the data you requested within 14 days.

#### **Deleting your information from our systems.**

If you wish, you may request that we delete any information we hold about you from our systems at any time. Requests of this nature can be submitted to <a href="mailto:secretary@wrekinsport.org.uk">secretary@wrekinsport.org.uk</a>. We will carry out your request within 14 days.

Please do bear in mind that it is not operationally possible to manage your membership if we do not retain information about you on our systems. As such, if you ask for us to delete your data in this way, your membership will cease immediately and you will not be entitled to any refund (either in full or prorata) for any fees paid for that year.

#### Appendix 2 – Subject Access Request Process

- 1. Individual emails membership@wrekinsport.org.uk with subject access request.
- 2. Club Secretary emails the individual back to acknowledge receipt and advise that we will respond with the data within 14 days.
- 3. Club Secretary arranges to secure the following information:
  - a) All data from the Membership CMS applicable to that individual, either as screen grabs or as a RAW CSV file.
  - b) Any race or trial results not recorded on the membership CMS;
  - c) Any official club photographs held by the club of the individual;
  - d) Any race, trial or event reports held by the club which feature the individual.
- 4. Once compiled the pack must be compressed electronically and encrypted with a secure password.
- 5. The file is then to be emailed to the subject. The decryption password must follow via separate means (e.g. a phone call or text message.
- 6. There must be no charge made for provision of data in this manner.
- 7. The request must be completed within 14 days of notification.

#### Appendix 3 – Right to be Forgotten

- 1. Individual emails membership@wrekinsport.org.uk requesting deletion of their personal data.
- 2. Club Secretary emails the individual back confirming receipt of request and setting out:
  - a. Deletion will constitute immediate cessation of their membership.
  - b. We will respond within 14 days to confirm that all relevant data has been removed.
- 3. Club Secretary informs Membership Secretary
- 4. Membership Secretary arranges to remove the individual's data from the membership management system.
- 5. Club Secretary checks race report results etc and arranges for club records to be amended to either remove reference to the individual or have their details removed from the records held.
- 6. Club Secretary checks event/race reports for reference to the individual and arranges for documents to be updated as required.
- 7. Club Secretary arranges for the individual to be removed from any private social media groups managed by the club on the basis that their membership is regarded as cancelled. Social media posts made by that member are also removed where permitted by the platform.
- 8. Membership secretary to delete details of any kit orders assigned to the individual.
- 9. Once these arrangements have been completed, an email is sent back to the individual to confirm that the process has been completed. The individual should be signposted to other information processors if there may be further data that needs deleting (e.g. public social media posts or removal from the British Cycling Website).

There must be no charge made for provision of data in this manner.

The request must be completed within 14 days of notification