

## **ALSAGER COMPANY OF ARCHERS**

### **DATA PROTECTION POLICY**

#### **Our Policy**

**ALSAGER COMPANY OF ARCHERS** is committed to complying with data protection law and respecting the rights of individuals. This policy applies to all club members.

This policy sets out our approach to data protection and the principles we apply to processing of personal data.

We recognise that the committee have a vital role to play in these aims and this policy will enable those aims to be met. It also sets out the consequences of failing to comply with data protection law. It is not an exhaustive document and it may be necessary to seek further advice if needed.

1. Who is responsible for data protection?
  - 1.1 All committee members
  - 1.2 We have appointed a data protection officer (DPO) to oversee the processes
2. Why do we have a policy?
  - 2.1 To ensure respectful and compliant processing of the personal data of all our members
  - 2.2 To ensure individual rights are maintained
  - 2.3 It acts in accordance with other policies (privacy, consent, IT security)
3. Implications of breach
  - 3.1 any breach may have serious implications
  - 3.2 The policy is written with both the GDPR and DPA 2018 in force
  - 3.3 All data must be processed in accordance with the DPA
4. Key words
  - 4.1 Personal data. Any data related to an individual, and can be used to identify that individual
  - 4.2 Identifiable data. Any data that can identify an individual or group of people
  - 4.3 Processing. The use the club makes of the data
5. Personal data processed by the club.
  - 5.1 Name
  - 5.2 Address
  - 5.3 DOB
  - 5.4 Email/contact details
  - 5.5 Medical or health details ONLY if relevant to the club and ONLY with the consent of the individual concerned
  - 5.6 Classification and handicap
  - 5.7 Club shoot results

## 5.8 Club records

### 6. Lawful Basis for processing

6.1 The data is required by the club for legitimate reasons (to allow membership, upkeep of club records, classes and handicaps as well as shoot results).

6.2 The subject has consented to the information processing (for example video or photography-including social media, website and club material)

### 7. When and how do we process data?

7.1 To maintain a list of club members and their contact details

7.2 To ensure club fees are paid up to date

7.3 To keep club records updated

7.4 To allow AGB a list of member names and dob. (External processing)

7.5 Data is accurate, up to date, confidential and encrypted, and not kept for longer than is needed (see privacy policy)

### 8. Subject Access Request

8.1 Any member can ask to see the data the club keeps on them

8.2 Any member can ask for correction of inaccurate data, or update data (for example contact details)

8.3 Ask for data to be erased (the right to be forgotten)

8.4 The right to object to processing of their data

8.5 These requests must be dealt with in a timely and sensitive manner, usually within one month of the request (usually made in writing).

### 9. Practical matters

9.1 Encrypt all data

9.2 Restrict access to those who really need it

9.3 Never leave data in a public place

9.4 Never leave any items containing personal data in unsecured locations (don't leave your laptop on the bus!)

9.5 Use password protection on files containing personal data

9.6 Shred any documents when no longer needed

9.7 Do not transfer any club data to a third party

9.8 Notify the DPO of any breach or loss of data