



Pythouse Club

Data Protection Policy

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Updated April 2018

1. POLICY STATEMENT

- 1.1 Everyone has rights with regard to the way in which their personal data is handled. During the course of our activities we will collect, store and process personal data about our members, and we recognise the importance of the correct and lawful treatment of this data.

2. ABOUT THIS POLICY

- 2.1 The types of personal data that Pythouse Club may handle include information about current and prospective members. The personal data may be held on paper, on a computer, or within a database managed by ClubSpark.
- 2.2 This policy and any other documents referred to in it sets out the basis on which we will process any personal data we collect from members.
- 2.3 This policy has been approved by The Pythouse Club Committee.
- 2.4 The Data Protection Compliance Manager is responsible for ensuring compliance with this policy. This post is held by the Treasurer, Stephen Dawson, info@pythouseclub.co.uk, 01747 445092. Any questions about the operation of this policy or any concerns that the policy has not been followed should be referred in the first instance to him.

3. DATA PROTECTION PRINCIPLES

Anyone processing personal data must comply with the following principles. Data must be:

- (a) Processed fairly and lawfully.
- (b) Processed for limited purposes and in an appropriate way.
- (c) Adequate, relevant and not excessive for the purpose.
- (d) Accurate.
- (e) Not kept longer than necessary for the purpose.
- (f) Processed in line with data subjects' rights.
- (g) Secure.

4. FAIR AND LAWFUL PROCESSING

4.1 The Act is not intended to prevent the processing of personal data, but to ensure that it is done fairly and without adversely affecting the rights of the data subject.

4.2 For personal data to be processed lawfully, they must be processed on the basis of one of the legal grounds set out in the Act. These include, among other things, the data subject's consent to the processing, or that the processing is necessary for the performance of a contract with the data subject, for the compliance with a legal obligation to which the data controller is subject. When processing personal data we will ensure that these requirements are met.

5. PROCESSING FOR LIMITED PURPOSES

5.1 In the course of our business, we may collect and process the personal data, including name, address, date of birth, phone numbers, email addresses, date of joining and payment records.

(a) *(As at April 2018, the Clubspark membership database software requires a date of birth entry, but Pythouse Club has no interest in this information. Any date may be entered, but adults should choose a nominal date which would make them over 18, in order to be classified as adult and thus receive emails etc. This software requirement is outside the Committee's immediate control but we hope that this field will be made optional in future).*

5.2 We will only process personal data for the following specific purposes

- (a) contacting members about their membership of Pythouse Club
- (b) notifying members of events taking place at the Club
- (c) providing email addresses to enable members to contact each other to arrange tennis fixtures

or for any other purposes specifically permitted by the Act. We will notify those purposes to the member when we first collect the data or as soon as possible thereafter.

6. NOTIFYING DATA SUBJECTS

6.1 When we collect personal data directly from members, we will inform them about the purposes for which we intend to process that personal data.

6.2 We will also inform data subjects whose personal data we process that we are the data controller with regard to that data, and who the Data Protection Compliance Manager is.

7. ADEQUATE, RELEVANT AND NON-EXCESSIVE PROCESSING

We will only collect personal data to the extent that it is required for the specific purpose notified to the member.

8. ACCURATE DATA

We will ensure that personal data we hold is accurate and kept up to date. We will check the accuracy of any personal data at the point of collection and at regular intervals afterwards. We will take all reasonable steps to destroy or amend inaccurate or out-of-date data.

9. TIMELY PROCESSING

We will not keep personal data longer than is necessary for the purpose or purposes for which they were collected. We will take all reasonable steps to destroy, or erase from our systems, all data which is no longer required.

10. PROCESSING IN LINE WITH MEMBERS' RIGHTS

We will process all personal data in line with members' rights, in particular their right to:

- (a) Request access to any data held about them by a data controller
- (b) Ask to have inaccurate data amended
- (c) Prevent processing that is likely to cause damage or distress to themselves or anyone else.

11. DATA SECURITY

- 11.1 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.

12. DISCLOSURE AND SHARING OF PERSONAL INFORMATION

- 12.1 We will not disclose or share any personal information with any third party outside the membership of Pythouse Club, unless we are under a legal obligation to do so.

13. CHANGES TO THIS POLICY

We reserve the right to change this policy at any time. Where appropriate, we will notify members of those changes by mail or email.