



## LES CROUPIERS RUNNING CLUB (LCRC) POLICY DOCUMENT

### *General Data Protection Policy & Privacy Statement*

**Policy number:** 1

**Scope:** All club members  
All non-club runners who participate in LCRC non-competitive events

**Version:** 1.2 (17 March 2018)

**Effective:** 1 April 2018

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#### **1 Context**

The General Data Protection Regulation (GDPR) is a change in government legislation regarding data protection which will come in to effect on 25 May 2018 across the European Community. When a person joins LCRC or renews their membership LCRC provides their details to Welsh Athletics Ltd (WAL) as an affiliated club; the member is also registered by the club with Welsh Athletics Ltd. This means that the club transfers the member's personal data to Welsh Athletics Ltd and UK Athletics via the club membership portal. It is therefore essential that members of affiliated clubs are aware of this transfer of personal data when they join or renew their membership. A copy of the Welsh Athletics Data Protection Policy can be found here: (<http://www.welshathletics.org/media/742779/data-protection-policy.pdf>)

#### **2 Privacy statement**

LCRC provides a brief Privacy Statement on the reverse side of the club's membership application form. This is intended to be transparent and accessible information regarding what information is being collected, who is collecting it, and how your personal data is retained and used.

#### **3 Purpose**

This policy establishes the requirements for LCRC's handling of personal data to comply with UK data protection legislation. This policy sets out the standards with which all members of the LCRC must comply. Non-compliance may leave LCRC open to litigation.

#### **4 Scope**

LCRC has adopted this policy to create a single common standard that takes into account the laws of jurisdiction where the LCRC operates within the United Kingdom. This policy and its schedules may be amended from time to time, with the latest version published on the LCRC website with open access to both members and potential members of the club.

#### **5 Definitions**

**Data subject** means a person, who may or may not be a fee paying member of the club, who provides personal data to LCRC about himself or herself.

**Personal data** is any information that can be used to specifically identify a person/data subject. It may be in any form (e.g. paper copy or electronic) and includes information, (referred to as Athletics Data) such as: gender, address, phone number(s), email address, date of birth and details of any coaching or officiating licenses and the person's Welsh Athletics Ltd unique reference number (URN). This list is indicative of such data, not exhaustive, and may include the name/contact details of next of kin (in case of emergency).

**Processing** refers to any action performed on personal data, including by automated means, such as collecting, forwarding, organizing, sharing, holding, retrieving, modifying, using, disclosing or deleting such data.

**Club member** refers to a person who has paid their club subscription for the current fiscal year (1 April to 31 March) or is a designated member of the club exempt from the annual subscription.

**Non-club member** refers to a person who participates in a club event that is not designated as a race and subject to the rules of Welsh Athletics Ltd. This will ordinarily cover evening training sessions in which runners participate who may subsequently become club members.

#### **6 Sensitive personal data**

LCRC will not hold "sensitive" personal data on any member or non-member that relates to a person's racial or ethnic origin, political views, religious or philosophical beliefs, physical or mental health, sexual orientation or criminal history. Sensitive personal data is a sub-set of personal data that is more protected under the law and is not required by LCRC. Explicit consent is always required to process sensitive personal data.

However, sensitive data around member disabilities and cultural background is core to Welsh Athletics Ltd work around inclusivity in the sport. Therefore, Welsh Athletics Ltd encourage every club to direct their members to enter this data directly into their Welsh Athletics Members Profile found here <http://www.welshathletics.org/athletes/members-portal.aspx> In this way LCRC does not have to capture, process or securely store these items of sensitive data.

## **7 Data protection principles**

LCRC aims to process personal data in a way that data subjects would expect and would consider a fair and reasonable use of their personal data. More specifically, LCRC will do each of the following:

- 1 Fairly and lawfully process personal data.
- 2 Process the data for specific club needs only (e.g. processing membership fees).
- 3 Use the data in accordance with information standards that require data to be:
  - adequate, relevant and not excessive
  - accurate, complete and current
  - kept in personally identifiable form only as long as necessary and
  - held securely.
- 4 Process the data in a way that respects the rights of data subjects.
- 5 Only transfer the personal data to locations (e.g. Welsh Athletics Ltd) that have adequate levels of protection.
- 6 Only use personal data for marketing purposes if the individual has given the club consent to do so.

Each of these principles is described in more detail below.

### **7.1 Fairly and lawfully processed**

To “fairly and lawfully” process personal data, the LCRC must have a legitimate reason for processing the data and generally do so in a transparent manner.

### **7.2 Process for specific club purposes**

As a general rule LCRC will collect personal data directly from the individual, and not via a third party. When persons provide personal data, LCRC will be clear and transparent about why the data is needed and what purpose it will be used for. Therefore, where appropriate, LCRC will make sure the right data capture statements are used to present to persons when they provide personal details.

### **7.3 Information standards**

LCRC will hold the minimum amount of personal data needed for the purpose for which it is collected. Furthermore, data security is essential when storing data online, so passwords will be kept safe and files encrypted where appropriate. The likes of Dropbox, OneDrive and Google Drive have built in security measures for the protection of files whilst in storage or in the process of being shared. When using third party software LCRC will ask for assurances over the security of the system. For example, ask the provider for an explanation of how data security is managed or ask if a Privacy Impact Assessment has been undertaken. Any breach in the security of personal data held by LCRC will be reported immediately to the affected data subject(s) and Welsh Athletics Ltd and advice sought on necessary action.

#### **7.4 Data subjects rights**

A data subject may enquire as to the nature of the personal data processed about him or her by LCRC. LCRC will do its best to respond to all reasonable requests. Data subjects will be provided with access to their personal data held by LCRC and other rights (e.g. rectification of data).

#### **7.5 Data transfer**

LCRC will only transfer personal data to locations which have adequate levels of security and organizational measures in compliance with data protection (e.g. Welsh Athletics Ltd).

#### **7.6 Marketing purposes**

One of the principles of the Data Protection Act 1998 (and the GDPR), is that LCRC can only process data for the purpose for which it is collected. This means that LCRC cannot use information to allow other bodies (e.g. a club sponsor) to contact a club member for marketing purposes. Therefore, personal data will only be used for marketing purposes if the individual has given the club consent to do so

### **8 Data protection procedures and monitoring**

#### **8.1 Enquiries about data protection**

The club does not have a designated protection officer; there is no requirement to do so. However, any questions about data protection should be directed to the membership secretary. All members of the committee are responsible for helping to ensure compliance with the club's data protection policy.

#### **8.2 Membership**

The LCRC website will include the following wording, or equivalent, to inform the member how personal data will be used by Welsh Athletics Ltd:

*"When you become a member of or renew your membership with Les Croupiers Running Club (LCRC) you will automatically be registered as a member of Welsh Athletics Ltd. We will provide Welsh Athletics Ltd with your personal data which they will use to enable access to an online portal for you (called myATHLETICS). Welsh Athletics Ltd will contact you to invite you to sign into and update your MyATHLETICS portal (which, among other things, allows you to set and amend your privacy settings)."*

#### **8.3 Training and competition entry**

In addition to passing data to Welsh Athletics Ltd, the use of personal data may include the following activities and more:

Training and competition entry:

- Sharing data with club coaches or officials to administer training sessions.

- Sharing data with club team managers to enter events.
- Sharing data with facility providers to manage access to the track or check delivery standards.
- Sharing data with leagues, county associations and other competition providers for entry in events.

Funding and reporting purposes:

- Sharing anonymised data with a funding partner as a condition of grant funding (e.g. a local authority).
- Using anonymised data to monitor club trends.

Membership and club management:

- Processing membership forms and payments.
- Sharing data with committee members to provide information about club activities, membership renewals or invitation to social events.
- Publishing race/competition results.
- Website management.

Marketing and communications (where separate consent is provided):

- Conducting surveys among club members to gather opinions.
- Sending information about promotions and offers from sponsors.
- Sending the club newsletter and/or other club information.
- Sending information about selling club kit, merchandise or fundraising.

#### **8.4 Financial records**

There is nothing of a sensitive nature retained in the financial records of the club that identifies an individual member. Deposits, whether cash or cheques are banked. No copies of cheques received are taken. There are no details of an individual's bank account recorded on a bank statement for the club.

Any payments to an individual are not made by bank transfer, only by cheque. Therefore, the club does not retain any club member's bank details. Any addresses to which a cheque may be sent is received by the club treasurer are received by personal email and not recorded whether electronically or as hard copy; such emails are deleted after the payment by cheque has been made.

#### **8.5 Events organized by LCRC**

When LCRC organizes an event that is open to non-members of the club, the provisions of this data policy apply to both members and non-members of the club. In other words, the personal data of an entrant, whether or not affiliated to a running club, will be treated as confidential, not shared with a third party unless essential for the event (e.g. a third party responsible for timing the event) and destroyed at the earliest opportunity after the event.

For training sessions open to non-members of the club (e.g. Thursday evening sessions for beginners) the club is entitled to temporarily retain next-of-kin contact

details of each person. These details will be treated as confidential, only used in an emergency to contact next-of-kin and destroyed when no longer required.

**8.6 Responding to subject access requests**

Requests for copies of personal data from individual club members will be responded to within one calendar month from the date the request is received. There is no charge for such requests. A log will be kept of any requests made for access to personal/athletics data. Note the club does not hold “sensitive personal data” on any club member (see paragraph 4 above).

**8.7 Obligations**

If a third party is used to process data (e.g. hosting the LCRC website, running the membership system/database) a written contract/agreement will be in place to protect the personal data and privacy of club members.

**8.8 Data retention**

Personal data will not be kept by LCRC for longer than is necessary for the purpose for which it was collected. For example, if a club member does not renew their membership in April, their personal data will be deleted from the membership data base and any other locations whether in paper or electronic format. Membership forms do not constitute a financial transaction and are shredded immediately after the information has been entered on the club database.