



## Tunbridge Wells Cricket Club Personal Data Protection Policy

Our policy describes how we collect, store and use personal data

### Personal data is collected and used by TWCC for the purpose of recording and managing:

- **Membership**, and hence access to the benefits members may derive from the Club, i.e. playing cricket, or participating in, or organising, the social activities of the Club, or being notified of your entitlement to apply for Tunbridge Wells Kent Week tickets. This may also include occasional communications from TWCC to alert members to additional cricket activities that we think may be of interest, and special offers for members from the supporters of our cricket programme.
- **Volunteers' participation** in supporting and running Club activities
- **Paid employee's** payment and tax

### The Club acknowledges that:

- the Committee is aware that Data Protection legislation applies to the Club
- all officials, staff and members understand how to handle personal data
- Club officials have given permission for their contact details to be made publicly available
- there is a process to follow if any Personal Data is lost or stolen
- changes within the Club that affect the use of Personal Data are communicated
- members understand that broadcast emails can present a security risk
- personal data will only be used for Club purposes
- failure to comply with the Data Protection legislation can mean substantial fines as well as reputational damage
- if a breach occurs, we must notify Information Commissioner's Office (ICO) within 72 hours
- if the Club fails to follow these regulations, we may be subjected to GDPR fines
- our data protection policy must be accessible and it can be viewed on the TWCC website

### Personal data

In compliance with the key data protection principles for **personal data\***, TWCC confirms that data are:

- processed fairly, lawfully and transparently
- collected for specified, explicit and legitimate purposes
- adequate, relevant and limited
- accurate and, where necessary, kept up to date
- kept for no longer than is necessary
- processed in a manner that ensures appropriate security of the personal data
- not used for automated decision making or and profiling
- never made available to third parties not directly connected with the delivery of our cricket programme

\*Data collected are the minimum necessary to manage our activities appropriately on behalf of our members, volunteers and paid employees. Some of the specific data that we collect are specified by other organisations, e.g. HMRC and 'Play Cricket' (for cricket competitions).

## Data security

### Personal data are held on secure websites

- TWCC website holds contact details of Club officials, supplied by them
- Emailmeform website holds details of youth membership original applications supplied by parents/guardians to facilitate membership invitations to join the Club, and details of those who have volunteered to help with our cricket programmes
- MailChimp website contains lists of members' and prospective members, email addresses (only) for the purposes of communication with members

### Personal data are kept by authorised TWCC Club officers on their own computers

- Only the **Membership Secretary**, the **Club Chairman** and The **Youth Chairman** have access to the entire membership data base
- Other Club officers are given extracts of the data on a 'need to know basis,' e.g. for the purpose of training groups or match management

We operate clear processes for deleting data when they are no longer required for the purposes they were collected.

## How we contact members, volunteers, and staff

We seek permission for personal data to be used by us as required, described above, from members, parents/guardians, Club officials, and staff.

Most written Club communications are by email, centred on annual Club memberships. Those who have no access to the internet receive membership-related communications in the post.

We use email handler MailChimp for mass communications and dedicated, @tunbridgewellsc.org.uk, email addresses. We authorise NXT Sportswear to email a shirt voucher to playing members each season. Club officers also send emails from their personal addresses. Where an individual has no access to internet we use the postal system.

## Rights given to individuals

Under our policy individuals have the right:

- to be informed of access
- to rectification
- to erasure
- to restrict processing
- to data portability
- to object