

#### **DATA PRIVACY POLICY**

#### Introduction

At Horsley & Send Cricket Club (HSCC), we take your privacy seriously especially as many of our members are children. We are committed to protecting the privacy and security of our members and we respect the importance of on-line data protection and security. HSCC is affiliated to the England and Wales Cricket Board ("ECB") through the Surrey Cricket Foundation and takes guidance from these bodies on the protection of data.

The General Data Protection Regulations (GDPR) which come into force on the 25<sup>th</sup> May 2018 require that some key data protection principles are complied with. These are to ensure data is

- processed fairly, lawfully and in a transparent manner
- collected for specified, explicit and legitimate purposes
- adequate, relevant and limited to the purposes
- accurate and where necessary kept up to date
- · kept for no longer than is necessary
- processed in a manner that ensures appropriate security of data, including protection against unauthorised or unlawful processing and against data loss

## What this Policy includes

This Policy describes how HSCC makes use of the personal data it collects from its members, employees, clients and donors. (Members include players, coaches, parents, guardians, social members, team captains, team administrators, Vice Presidents, Life Members, first aiders, officers and officials, volunteers etc). This policy extends to the use of the website created on the Pitchero Platform <a href="http://www.pitchero.com/clubs/horsleysendcricket">http://www.pitchero.com/clubs/horsleysendcricket</a> and the Horsley & Send Cricket Club website <a href="http://www.horsleyandsendcc.co.uk">http://www.horsleyandsendcc.co.uk</a> and to data stored on the ECB's Play Cricket website <a href="https://horsleyandsend.play-cricket.com">https://horsleyandsend.play-cricket.com</a>.

It also describes your data protection rights, including the right to object to some of the processing which we carry out. More information about your rights, and how to exercise them, is set out later in the document. Reference to "you" or "your" shall also mean "your child/children" or "your child/s/children's".

## How we collect your personal information

We may collect your personal information:

- directly from you, when you apply to become a member or renew your membership of HSCC, when you make
  enquiries on any HSCC website, when you provide information via email, by text or any other means with
  HSCC or a HSCC volunteer (such as a coach, manager, team admin, first aider or other volunteer) when you
  interact with us during your time as a member in various other ways (for example, when you enter a
  competition, sign up for a course or coaching.)
- from someone else who has applied for membership on your behalf (for example someone with parental responsibility or a family member)
- directly from you when you enquire about, or make a booking in relation to a business or private event to be held at the premises of HSCC
- from details obtained from you when you make a donation.



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# The types of information we collect

We collect and process personal data from you or your parent when you join and when we carry out annual renewals of your membership, including:

- vour name
- your gender
- your date of birth
- your home address, e-mail address and phone number, including mobile phone numbers
- your type of membership
- your participation in particular teams or any key role you may have been allocated, such as Team Admin, Manager, Coach, President, Chair, Treasurer, Secretary etc
- your marketing preferences, including any consents you have given us
- your medical conditions or disability, where you provide this to us with your consent (or your parent's consent) to ensure we are aware of any support we may need to provide to you
- familial relationships with other members
- school (for players under 18)
- skill or occupation (for adults)

#### In addition, we record

- the receipt of membership fees and
- any Disclosure and Barring Service (DBS) status

Some information will be generated as part of your involvement with us, in particular data about your performance, involvement in particular matches in match reports and details of any disciplinary issues or incidents you may be involved in on and off the pitch, such as within health and safety records. For the purposes of employment, and in particular the need for checking your eligibility or ability to work for us, we require your passport and NI details, as well as bank details for paying salaries, and starter information required by HMRC i.e. student loan, address and contact details. We may also collect certain information when you volunteer your services to HSCC. For other individuals, your name and contact details to enable us to contact you to process your request or possible venue rental or donation, including data required for Gift Aid purposes.

## Information we receive from third parties

Sometimes, we receive information about you from third parties. For example, if you are a child, we are likely to be given information about you by your parents. We may receive information relating to your existing registrations with other clubs. Additionally, for certain role holders or those working with children, we may receive information from the Disclosure and Barring Service and ECB on the status of any DBS check you have been required to take.

### How we use your information

The purpose of collecting data is for club administration purposes only. Personal data will never be sold or used by the club for commercial gain. Those club officials such as team managers, team admins, coaches and the Committee have given their assurances that such data is only used for its specified purpose and will not be passed to anyone else or any other commercial organisation. In addition, permission levels for accessing data is determined by specific use and those access controls are regularly reviewed.

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## We use this personal data to

- communicate with you
- manage your membership and involvement with the club
- keep in contact with you such as in an emergency situation or to update details
- maintain player participation records such as availability, selection and performance including team sheets, statistics and match reports
- ensure compliance with the current ECB Rules and Regulations including those on the affiliation of clubs, qualifications of coaches, umpires and scorers
- fulfil our business obligations such as the need to retain supplier payment details

## Use of data in specific circumstances

- we may use CCTV cameras to maintain the security of our premises and may use this video to investigate incidents at HSCC or its premises
- where required by law to meet specific legal requirements, we will maintain health and safety records, accounting and taxation records and details regarding the right to work
- for those working with children, with your consent, we will need to confirm that you have undergone an appropriate DBS check as required by the ECB.
- if requested, we may provide information to law enforcement or government bodies in the conduct of an investigation
- we will send you direct marketing or promotional material by email only for and on behalf of HSCC and its current sponsors, unless consent has been revoked
- we may handle medical or disability information you or your parent provides to us, to ensure we support you appropriately
- on other occasions where we ask you for consent, we will use the data for the purpose which we explain at that time

# Withdrawing consent

Wherever we rely on your consent, you will always be able to withdraw that consent, although we may have other legal grounds for processing your data for other purposes, such as those set out above. In some cases, we may need to send you direct marketing without your consent, where we rely on our legitimate interests. You have an absolute right to opt-out at any time. You can do this by following the instructions in the communication where this is an electronic message, or by contacting us using the details as set out on the main page of the website.



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#### Who we share this data with

Personal data may be shared with government authorities and/or law enforcement officials if required for the purposes above, if mandated by law or if required for the legal protection of our or the ECB's legitimate interests in compliance with applicable laws.

Personal data will be shared with third party service providers, who will process it on our behalf for the purposes identified above. Such third parties include:

 Pitchero as the provider of the HSCC team management system, a communication hub for players and a sharing platform for members to post club news. More information regarding data use by Pitchero can be found at

> http://www.pitchero.com/privacy-policy http://www.pitchero.com/terms-of-service

- The ECB as the provider of the Play Cricket scoring apps, stats and match reports. More information regarding the ECB's privacy notice can be found at <a href="https://www.play-cricket.com/#pcpp">https://www.play-cricket.com/#pcpp</a>
- We may share your data with:
- volunteers and employees for the purposes of administering your membership, organising activities and events relating to your membership, and giving you access to what you are entitled to as a member of HSCC
- sport coaches and any other provider of membership services such as age group managers, coaches, team captains, first aiders etc
- other HSCC members for the purposes of sporting and club administration (such as arranging matches, fixtures, festivals and tournaments, training and coaching sessions, meetings and social events). This may include the use of spreadsheets.
- other HSCC members subscribed to HSCC social media platforms including apps such as Pitchero Club and Pitchero Manager, WhatsApp, Facebook, Instagram, Snapchat and Twitter. (for the sharing of news, highlights, results, club functions, events and activities.)

Some limited information may be shared with other stakeholders in cricket, such as other clubs, constituent bodies, umpire and scoring bodies and league organisers, so that they can maintain appropriate records and assist us in organising matches and administering games.

#### **Your rights**

As an individual you have

- the right to be informed
- the right of access
- the right to rectification
- the right to erasure
- the right to restrict processing
- the right to data portability
- the right to object
- rights in relation to automated decision making and profiling

These rights may be limited, for example if fulfilling your request would reveal personal data about another person, or if you ask us to delete information which we are required by law to keep or have compelling legitimate interests in keeping.

To exercise any of these rights, you can contact us or, as appropriate, the ECB or Pitchero using the details provided. If you have unresolved concerns, you have the right to complain to the Information Commissioner's Office <a href="https://ico.org.uk/global/contact-us">https://ico.org.uk/global/contact-us</a>.



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Much of the information listed above must be provided on a mandatory basis so that we can make the appropriate legal checks and register you as required by ECB Rules and Regulations. We will inform you which information is mandatory when it is collected. Some information is optional, particularly information such as your medical information. If this is not provided, we may not be able to provide you with appropriate assistance, services or support.

#### **Retention of Data**

When terminating membership of HSCC, your personal record on Pitchero will be deleted thereby removing you from our database. You will no longer be contacted via official HSCC means –generally e-mail via Pitchero or Pitchero notifications and as a player you will no longer be eligible for team selection.

Historical reference may be left intact such as comment in a match report, team participation or player statistics and may remain indefinitely. Your name may also appear on honours boards and similar material either on-line or in and around the clubhouse and grounds.

If personal data is required in connection with performing a contract or for a competition it is kept for seven years from your last interaction with us.

Information for statutory record keeping will be retained in compliance with statutory regulations and guidance.

#### How to contact us

If you require any clarification on the way we process your data or would like to cease membership and be removed from the database, please contact one of our Committee Members – details are available on the main page of the website <a href="http://www.pitchero.com/clubs/horsleysendcricket">http://www.pitchero.com/clubs/horsleysendcricket</a>. We are open to any comments or insights regarding our policies therefore similarly, if you have any concerns or suggested improvements please get in touch with the Chairman or Welfare Officer.

In addition, you can update your details and e-mail preferences at any time by logging into Pitchero and navigating to https://secure.pitchero.com/account/settings/emails

## Changes to our privacy policy

Any changes we may make to this privacy policy in the future will be posted on this page and made available on the website. We encourage you to check this privacy policy from time to time for any updates or changes. We see this as a process of continuous improvement and therefore welcome your comments regarding required updates.