TWICKENHAM CYGNETS FC
DATA PROTECTION POLICY

1. **About this Policy**

1.1 Twickenham Cygnets FC (**"Club"**), ("**we", "our", "us"**) handles personal data about current, former, and on occasion prospective players and their parents or guardians, employees, volunteers, committee members, other Club members, referees, coaches, managers, contractors, third parties, suppliers, and any other individuals that we communicate with.

1.2 In your official capacity with the Club, you may process personal data on our behalf, and we will process personal data about you. We recognise the need to treat all personal data in an appropriate and lawful manner, in accordance with the EU General Data Protection Regulation 2016/679 (**GDPR**).

1.3 Correct and lawful treatment of this data will maintain confidence in the Club and protect the rights of players and any other individuals associated with the Club. This Policy sets out our data protection responsibilities and highlights the obligations of the Club, which means the obligations of our employees, committee, volunteers, members, and any other contractor or legal or natural individual or organisation acting for or on behalf of the Club.

1.4 You are obliged to comply with this policy when processing personal data on behalf of the Club, and this policy will help you to understand how to handle personal data.

1.5 The Club committee will be responsible for ensuring compliance with this Policy. Any questions about this Policy or data protection concerns should be referred to the committee.

1.6 We process volunteer, member, referee, coach, manager, contractor, committee, supplier and third party personal data for administrative and Club management purposes. Our purpose for holding this personal data is to be able to contact relevant individuals on Club and our legal basis for processing your personal data in this way is the contractual relationship we have with you. We will keep this data for 2 months after the end of your official relationship with the Club, unless required otherwise by law and / or regulatory requirements. If you do not provide your personal data for this purpose, you will not be able to carry out your role or the obligations of your contract with the Club.

1.7 All the key definitions under GDPR can be found here.

2. **What we need from you**

2.1 To assist with our compliance with GDPR we will need you to comply with the terms of this policy. We have set out the key guidance in this section but please do read the full policy carefully.

2.2 Please help us to comply with the data protection principles (set out briefly in section 3 of this policy and in further detail below):

2.2.1 please ensure that you only process data in accordance with our transparent processing as set out in our Privacy notice;

2.2.2 please only process personal data for the purposes for which we have collected it (i.e. if you want to do something different with it then please speak to Eamonn Newell first);

2.2.3 please do not ask for further information about players and / or members and / or staff and / or volunteers without first checking with Eamonn Newell.

2.2.4 if you are asked to correct an individual's personal data, please make sure that you can identify that individual and, where you have been able to identify them, make the relevant updates on our records and systems;

2.2.5 please comply with our retention periods listed in our Privacy Notice and make sure that if you still have information which falls outside of those dates, that you delete/destroy it securely;

2.2.6 please treat all personal data as confidential. If it is stored in electronic format then please consider whether the documents themselves should be password protected or whether your personal computer is password protected and whether you can limit the number of people who have access to the information. Please also consider the security levels of any cloud storage provider (and see below). If it is stored in hard copy format then please make sure it is locked away safely and is not kept in a car overnight or disposed of in a public place;

2.2.7 if you are looking at using a new electronic system for the storage of information, please talk to Eamonn Newell first so that we can decide whether such a system is appropriately secure and complies with GDPR;

2.2.8 if you are planning on sharing personal data with anybody new or with a party outside the FA structure then please speak to Eamonn

Newell before doing so who will be able to check that the correct contractual provisions are in place and that we have a lawful basis to share the information;

2.2.9 if you receive a subject access request (or you think somebody is making a subject access request for access to the information we hold on them) then please tell [insert name] as soon as possible because we have strict timelines in which to comply;

2.2.10 if you think there has been a data breach (for example you have lost personal data or a personal device which contains personal data or you have been informed that a coach has done so, or you have sent an email and open copied all contacts in) then please speak to Eamonn Newell who will be able to help you to respond.

If you have any questions at any time then please just ask Eamonn Newell. We are here to help.

3. **Data protection principles**

3.1 Anyone processing personal data must comply with the enforceable principles of data protection. Personal data must be:

3.1.1 processed lawfully, fairly and in a transparent manner;

3.1.2 collected for only specified, explicit and legitimate purposes;

3.1.3 adequate, relevant and limited to what is necessary for the purpose(s) for which it is processed;

3.1.4 accurate and, where necessary, kept up to date;

3.1.5 kept in a form which permits identification of individuals for no longer than is necessary for the purpose(s) for which it is processed;

3.1.6 processed in a manner that ensures its security by appropriate technical and organisational measures to protect against unauthorised or unlawful processing and against accidental loss, destruction or damage;

3.2 We are responsible for and must be able to demonstrate compliance with the data protection principles listed above.

4. **Fair and lawful processing**

4.1 This Policy aims to ensure that our data processing is done fairly and without adversely affecting the rights of the individual.

4.2 Lawful processing means data must be processed on one of the legal bases set out in the GDPR. When special category personal data is being processed, additional conditions must be met.

5. **Processing for limited purposes**

5.1 The Club collects and processes personal data. This is data we receive directly from an individual and data we may receive from other sources.

5.2 We will only process personal data for the purposes of the Club as instructed by the committee, the County FA or The FA, or as specifically permitted by the GDPR. We will let individuals know what those purposes are when we first collect the data or as soon as possible thereafter.

6. **Consent**

6.1 One of the lawful bases on which we may be processing data is the individual's consent.

6.2 An individual consents to us processing their personal data if they clearly indicate specific and informed agreement, either by a statement or positive action.

6.3 Individuals must be easily able to withdraw their consent at any time and withdrawal must be promptly honoured. Consents should be refreshed every season.

6.4 Explicit consent is usually required for automated decision-making and for cross-border data transfers, and for processing special category personal data. Where children are involved then the consent must be in writing from parent/guardian

6.5 Where consent is our legal basis for processing, we will need to keep records of when and how this consent was captured.

6.6 Our Privacy Notice sets out the lawful bases on which we process data of our players and members.

7. **Notifying individuals**

7.1 Where we collect personal data directly from individuals, we will inform them about:

7.1.1 the purpose(s) for which we intend to process that personal data;

7.1.2 the legal basis on which we are processing that personal data;

7.1.3 where that legal basis is a legitimate interest, what that legitimate interest is;

7.1.4 where that legal basis is statutory or contractual, any possible consequences of failing to provide that personal data;

7.1.5 the types of third parties, if any, with which we will share that personal data, including any international data transfers;

7.1.6 their rights as data subjects, and how they can limit our use of their personal data;

7.1.7 the period for which data will be stored and how that period is determined;

7.1.8 any automated decision-making processing of that data and whether the data may be used for any further processing, and what that further processing is.

7.2 If we receive personal data about an individual from other sources, we will provide the above information as soon as possible and let them know the source we received their personal data from;

7.3 We will also inform those whose personal data we process that we, the Club, are the data controller in regard to that data, and which individual(s) in the Club are responsible for data protection.

8. **Adequate, relevant and non-excessive processing**

8.1 We will only collect personal data that is required for the specific purpose notified to the individual.

8.2 You may only process personal data if required to do so in your official capacity with the Club. You cannot process personal data for any reason unrelated to your duties.

8.3 The Club must ensure that when personal data is no longer needed for specified purposes, it is deleted or anonymised.

9. **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 the start of each season. We will take all reasonable steps to destroy or amend inaccurate or out-of-date data.

10. **Timely processing**

We will not keep personal data longer than is necessary for the purpose(s) for which they were collected. We will take all reasonable steps to destroy or delete data which is no longer required, as per our Privacy Notice.

11. **Processing in line with data subjects' rights**

11.1 As data subjects, all individuals have the right to:

11.1.1 be informed of what personal data is being processed;

11.1.2 request access to any data held about them by a data controller;

11.1.3 object to processing of their data for direct-marketing purposes (including profiling);

11.1.4 ask to have inaccurate or incomplete data rectified;

11.1.5 be forgotten (deletion or removal of personal data);

11.1.6 restrict processing;

11.1.7 data portability; and

11.1.8 not be subject to a decision which is based on automated processing.

11.2 The Club is aware that not all individuals' rights are absolute, and any requests regarding the above should be immediately reported to the committee, and if applicable escalated to the County FA for guidance.

12. **Data security**

12.1 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.

12.2 We have proportionate procedures and technology to maintain the security of all personal data.

12.3 Personal data will only be transferred to another party to process on our behalf (a **data processor**) where we have a GDPR-compliant written contract in place with that data processor.

12.4 We will maintain data security by protecting the confidentiality, integrity and availability of the personal data.

12.5 Our security procedures include:

12.5.1 **Entry controls.** Any stranger seen in entry-controlled areas should be reported.

12.5.2 **Secure desks, cabinets and cupboards.** Desks and cupboards should be locked if they hold personal data.

12.5.3 **Methods of disposal.** Paper documents should be shredded. Digital storage devices should be physically destroyed.

12.5.4 **Equipment.** Screens and monitors must not show personal data to passers-by, and should be locked when unattended. Excel spreadsheets will be password protected.

12.5.5 **Personal Devices.** Anyone accessing or processing the Club's personal data on their own device, must have and operate a password only access or similar lock function, and should have appropriate anti-virus protection. These devices must have the Club's personal data removed prior to being replaced by a new device or prior to such individual ceasing to work with or support the Club.

13. **Disclosure and sharing of personal information**

13.1 We share personal data with the County FA and The FA, and with applicable leagues using Whole Game System.

13.2 We may share personal data with third parties or suppliers for the services they provide, and instruct them to process our personal data on our behalf as data processors. Where we share data with third parties, we will ensure we have a compliant written contract in place incorporating the minimum data processer terms as set out in the GDPR, which may be in the form of a supplier's terms of service.

13.3 We may share personal data we hold if we are under a duty to disclose or share an individual's personal data in order to comply with any legal obligation, or in order to enforce or apply any contract with the individual or other agreements; or to protect our rights, property, or safety of our employees, players, other individuals associated with the Club or others.

14. Transferring personal data to a country outside the EEA

We may transfer any personal data we hold to a country outside the European Economic Area (**EEA**), provided that one of the appropriate safeguards applies.

15. Reporting a personal data breach

15.1 In the case of a breach of personal data, we may need to notify the applicable regulatory body and the individual.

15.2 If you know or suspect that a personal data breach has occurred, inform a member of the committee immediately, who may need to escalate to the County FA as appropriate. You should preserve all evidence relating to a potential personal data breach.

16. Dealing with subject access requests

16.1 Individuals may make a formal request for information we hold about them. Anyone who receives such a request should forward it to the board/committee immediately, and where necessary escalated to the

County FA for guidance. Nobody should feel bullied or pressured into disclosing personal information.

16.2 When receiving telephone enquiries, we will only disclose personal data if we have checked the caller's identity to make sure they are entitled to it.

17. **Accountability**

17.1 The Club must implement appropriate technical and organisational measures to look after personal data, and is responsible for, and must be able to demonstrate compliance with the data protection principles.

17.2 The Club must have adequate resources and controls in place to ensure and to document GDPR compliance, such as:

17.2.1 providing fair processing notice to individuals at all points of data capture;

17.2.2 training committee and volunteers on the GDPR, and this Data Protection Policy; and

17.2.3 reviewing the privacy measures implemented by the Club.

18. **Changes to this policy**

We reserve the right to change this policy at any time. Where appropriate, we will notify you by email.