

# **Delph and Dobcross Cricket Club**

## **Privacy Policy Statement**

Delph and Dobcross Cricket Club is committed to respecting the privacy of all our members (senior and junior) and also the parents of junior members. This policy statement explains how we may use the personal information we collect from you. It also sets out how we comply with the law on data protection and what your rights are.

We have not appointed a Data Protection Officer to oversee our compliance with data protection laws as we not required to do so, but our Chairman and Junior Cricket Coordinator have overall responsibility for data protection compliance in the Club. Contact details are set out in the "Contacting us" section at the end of this privacy policy statement.

#### Personal information we may collect from you

Depending on the type of membership you register for, we may obtain personal information about you or your child, such as:

- personal contact details that allow us to contact you directly such as name, home address, email address and telephone numbers;
- date of birth and gender;
- records of your attendance at any matches or events hosted by us;
- video and photographic images;
- details of next of kin, family members, coaches and emergency contacts;
- details of performance at matches and aggregated cricket statistics;
- records of your interactions with us, such as telephone conversations, emails and other correspondence; and
- any disciplinary and grievance information.

## Special categories of personal information

We may also obtain more sensitive personal information about the health of you or your child, including details about any medical condition, allergies or disability.

This information is provided on a voluntary basis by members and parents in the interests of protecting the health and welfare of our senior and junior players and to assist in our response to any medical or other emergency. Therefore, we consider that this personal data is held in the course of the legitimate activities of the Club and that appropriate safeguards are in place.

However, we understand the principles of consent for processing special categories of more sensitive personal information and all members and parents have the opportunity to update, amend or delete information about their own or their child's health at any time and will be reminded of this annually as part of the registration process.

We may also collect criminal records information about our officials, coaches and volunteers. For criminal records history, we will process this on the basis of our legal obligations or based on your explicit consent.

#### Where we collect your information

We typically collect personal information about our members when you apply to become a member of the club or when you purchase any services or products we offer (e.g. subscriptions, coaching programmes and clothing), when you make a query or complaint or when you correspond with us by phone, e-mail or in some other way.

If you are providing us with details of family members and emergency contacts, they have a right to know and to be aware of how what personal information we hold about them, how we collect it and how we use that information. Please share this privacy notice with those of them whom you feel are sufficiently mature to understand it. They also have the same rights as set out in the "Your rights in relation to personal information" section below.

## Uses made of the information

This section describes the main purposes for which we process your personal information, the categories of your information involved and our lawful basis for being able to do this.

(a) To administer any membership you have with us and managing our relationship with you, including dealing with payments and any support, service, product enquiries or complaints made by you.

#### Personal information used

All contact and membership details, transaction and payment information and records of your interactions with us.

#### Lawful basis

To enable us to properly manage and administer your membership of the Club.

(b) To send you information about and manage Club membership, activities, matches, events, training and products and other cricket-related matters.

#### Personal information used

All contact details.

#### Lawful basis

To enable us to properly manage and administer your membership of the Club.

(c) To record attendance and performances at events and matches.

#### Personal information used

Records of attendance at any events or matches, together with score sheets.

#### Lawful basis

We have a legitimate interest in doing so to ensure equal opportunities, assess performances and to properly manage the affairs of the Club.

(d) To promote and celebrate the Club and its activities.

#### Personal information used

Photographic and video images, match reports and scores.

#### Lawful basis

In the legitimate interest of the Club and where you have given us explicit consent to do so in the case of images.

(e) To use information about your physical or mental health (including any injuries) or disability status, to ensure your health and safety and to assess your fitness to participate in any events or activities we host and to provide appropriate adjustments to our sports facilities.

#### Personal information used

Information about the health of our members, including medical conditions, allergies and disabilities and contact details of GPs.

#### Lawful basis

We have a legal obligation and a legitimate interest to protect the health and wellbeing of our members and to provide a safe environment in which to participate in cricket. We process special category personal data on the basis described previously. Members and parents give explicit consent for us to hold this information as part of the annual registration process and have the opportunity to delete, update or amend this information at any time.

(f) To comply with legal obligations, for example, regarding people working with children or vulnerable adults to comply with our safeguarding requirements

#### Personal information used

Information about criminal convictions and offences of officials, coaches and volunteers.

#### Lawful basis

Legal obligations or based on explicit consent.

If you do not provide us with some of the requested personal information, we may not be able to admit you as a member or we may not be able to properly manage your membership resulting in it being terminated. For other personal information, you may not be under an obligation to provide it, but we believe that this would not be in the best interests of the legitimate operation of the Club.

Where you have given us your consent to use your personal information in a particular manner, you have the right to withdraw this consent at any time, which you may do by contacting us as described in the "Contacting us" section below. You may also delete, update or amend your own electronic online records at any time.

Please note however that the withdrawal of your consent will not affect any use of data made before you withdrew your consent, and we may still be entitled to hold and process the relevant personal information to the extent that we are entitled to do so on legal bases other than your consent. Withdrawing consent may also have the same effects as not providing the information in the first place, for example, we may no longer be able to properly manage your membership of the Club.

#### Disclosure of your personal data

Personal information that you enter through our website on registration or at other times is held on a secure data protection compliant system operated by Delph and Dobcross Cricket Club website.

Information relating to cricket matches is also recorded on Play Cricket and made available publicly. This will be restricted to the names of players, individual batting and bowling performance figures and aggregated statistics.

Otherwise, we will share personal information with the following parties:

- the government or our regulators where we are required to do so by law; and
- police, law enforcement and security services to assist with the investigation and prevention of crime and the protection of national security;
- governing bodies or regional and county bodies for cricket (with your consent in the case of special category information).

We will only share personal information in other circumstances where requested or approved by you.

#### Transferring your personal information internationally

The personal information we collect is not transferred to or stored in countries outside of the UK and the European Union.

#### How long do we keep personal information for?

It is important to ensure that the personal information we hold about you is accurate and up-todate. You should let us know if anything changes, for example, if you change your phone number or email address, by updating your personal record or that of your child on our website. Alternatively, you can contact us by using the details set out in the "Contacting us" section below. Equally, if you are no longer involved with the Club, you may wish to delete your record.

The duration for which we retain your personal information will differ depending on the type of information and the reason we collected it from you. However, in some cases, personal information may be retained on a long-term basis (for example, personal information that we need to retain for legal purposes will normally be retained in accordance with usual regulatory requirements). Generally, where there is no legal requirement, we retain all physical and electronic records for a period of six years after your last contact with us or the end of your membership. Exceptions to this rule are information that may be relevant to personal injury or discrimination claims may be retained until the limitation period for those types of claims has expired. For personal injury or discrimination claims, this can be an extended period as the limitation period might not start to run until a long time after the event.

#### Your rights in relation to personal information

You have the following rights in relation to your personal information:

- the right to be informed about how your personal information is being used;
- the right to access the personal information we hold about you;
- the right to request the correction of inaccurate personal information we hold about you;
- the right to request the erasure of your personal information in certain limited circumstances;
- the right to restrict processing of your personal information where certain requirements are met;
- the right to object to the processing of your personal information;
- the right to request that we transfer elements of your data either to you or another service provider, and
- the right to object to certain automated decision-making processes using your personal information.

You should note that some of these rights, for example the right to require us to transfer your data to another service provider or the right to object to automated decision making, may not apply as they have specific requirements and exemptions which apply to them, and they may not apply to personal information recorded and stored by us. For example, we do not use automated decision making in relation to your personal data. However, some have no conditions attached, so your right to withdraw consent or object to processing for direct marketing are absolute rights.

Whilst this privacy policy statement sets out a general summary of your legal rights in respect of personal information, this is a very complex area of law. More information about your legal rights can be found on the Information Commissioner's website at <a href="https://ico.org.uk/for-the-public/">https://ico.org.uk/for-the-public/</a>,

To exercise any of the above rights, or if you have any questions relating to your rights, please contact us by using the details set out in the "Contacting us" section below.

If you are unhappy with the way we are using your personal information, you can also complain to the UK Information Commissioner's Office or your local data protection regulator. We are here to help and encourage you to contact us to resolve your complaint first.

#### Changes to this policy statement

We may update this privacy policy statement from time to time. When we do so in a material way, we will update the version date at the bottom of this page. For significant changes to this notice, we will try to give you reasonable notice unless we are prevented from doing so. Where required by law, we will seek your consent to changes in the way we use your personal information.

## **Contacting us**

In the event of any query or complaint in connection with the information we hold about you, please contact:

Ann Hargreaves, Club Secretary, Delph and Dobcross Cricket Club, on 07709 840871

or

Les Harrison, Senior Committee Member, Delph and Dobcross Cricket Club, on 07504 110286 or <u>les.harrison@delph1.plus.com</u>.