

Appendix 9 To Ballymena RFC Club Welfare Policy version Aug 21

Ballymena Rugby Football & Cricket Club Privacy Notice



1. Introduction

1.1. Protecting our members personal data is important to Ballymena Rugby and Cricket Club. This Privacy Notice sets out how we collect, use, store, share and protect your personal data in compliance with General Data Protection (GDPR) legislation. The Club will never process or sell for financial gain any data passed to it by its membership.

1.2. This notice will be regularly reviewed to ensure we continue to meet our obligations in processing your personal data and protecting your privacy. In order to do so, we reserve the right to update, modify and amend this notice at any time as required. We recommend that you regularly check the Club website to keep informed of any updates.

1.3. We are committed to protecting your personal data and to implementing appropriate technical and organisational security measures to safeguard against any unauthorised or unlawful processing and against any accidental loss, destruction, or damage.

2. The Types of Data Collected

In order to run our Club, we need to collect various types of personal data. This personal data includes: name, address, contact details such as telephone number, mobile phone number, email address, date of birth, bank details, ID card photographs and next of kin details. In certain circumstances, and as part of our regulatory requirements, we may collect special categories of personal data including, but not limited to; injury details, physio treatment, disabilities or special needs information. The majority of data will be collected using IRFU approved "Rugby Connect/Sportlomo" IT systems.

3. Statutory / Contractual / Legitimate Information

Not all personal information needs your consent to be held and processed because it is required to be able to run the Club within the law (both national and local by-laws) and in compliance with the governing and regulatory guidelines of the Irish Rugby Football Union (IRFU) and Northern Cricket Union (NCU). The following are the types of information which the club can request and process with a legal, contractual or legitimate interest to do so:

- Names, addresses and proof of identity will be required to gain appropriate criminal record checks (Access NI) clearances for coaches and helpers this is a regulatory requirement by IRFU/NCU Safeguarding policy.
- In order to manage club membership in accordance with IRFU/NCU regulations, entry on the IRFU "Rugby Connect/SportLomo" and NCU systems will be required. Once the information is passed to the controlling organisation they are then responsible under GDPR for the security, retrieval and disposal of this data. See the appropriate governing body privacy notice for detail.
- Names and addresses on registration forms and payment details are all held under a contractual need to run the Club in accordance with IRFU/NCU and HMRC guidelines. This data is retained by the appointed club official and disposed of when a membership is confirmed as expired.
- Names and addresses may be required to the statutory responsibilities the Club has to central and local government legislation and obligations e.g. the reporting of dangerous occurrences under Health and Safety legislation and in support of grant applications to local councils.
- Names, addresses, pictures, witness statements and records to carry out investigations or undertake a disciplinary process in line with club constitution and IRFU/NCU regulations. This data will be retained and disposed of by the appropriate club official when any penalty has been "spent" or regulatory governing body retention period expired.
- To make team selections and provide officials/regulatory bodies with team details the presentation of names and dates of birth are legitimately required. This data will be disposed of in accordance with governing body regulation.
- The legitimate recording of club meetings held under the conditions of the club constitution and policies and the recording of any related findings or follow up actions. The appropriate club official will have responsibility for the retention and disposal of these records in accordance with the Club records retention policy.

Statutory / Contractual / Legitimate Information cont.

- The publication of names and contact details will be legitimately publicised in club handbooks and website to provide the club membership and interested parties appropriate contact points within the Club framework. These will be changed in accordance with the change of post holder and republication of the handbook etc.
- Names and addresses including email will be used by club officials and their appointed assistants to legitimately inform and publicise to the membership and interested parties any sporting and social events associated with the club. The Club will never process or sell for financial gain to a 3rd party any data passed to it by its membership for direct marketing purposes.
- The Club age-grade and SEN sections will legitimately request from Carer/Guardians any pertinent medical information regarding its players. This information will only be recorded and retained for the sole use of the head coach or age grade leader in order that they may take appropriate action should the player become unwell, injured or to avoid an inappropriate training or game related exercise for the player. This information will be destroyed by the head coach or age grade leader at the end of the players registration for that period i.e. at the end of the season or sooner if the player withdraws membership.
- For some players medical information will be legitimately required to be held if they are treated by the Club physio service. This information will only be retained to allow for a treatment history to be kept for the duration of that players registration and membership of that team. On completion of his/her membership destruction of all records is to be ensured by the team manager.
- The Club has a legitimate need to take and use digital images or video of SEN, age-grade and adult players, parents, carers and members taken during events, training or match days (in addition though Safeguarding considerations do apply, see Section 4 below). These images or materials are to be used solely for the promotion of the club and associated events in publications, web or social media pages.

4. Information for which Consent is Required

4.1 The club will gain consent for the use of digital images or video through the registration process. Should consent not be given, the club will be informed, and the necessary steps will be taken to ensure compliance.

5. Your Rights

5.1 Right of Access You have the right to be provided with details regarding the processing of your personal data, and to obtain a copy of the personal data the Club holds about you, subject to applicable exemptions and the data protection of others. To help the Club better deal with your request you will need to provide us with the information necessary to identify you and to identify the personal data you require. In order to make a subject access request you should send an email or make a request in writing to the appropriate Club official. There may be a charge for this request if it is manifestly unfounded or excessive. The cost will be based on the administrative cost of providing the information.

5.2 Response Time The Club will respond to your request within one month of receipt or inform you of a date in circumstances where an extension may be required.

6. Update / More Information

If, at any time, you wish to update the information we hold about you or, for further information on how the Club maintains the security of your information, and your rights to access information we hold on you, please contact the Club Data Protection Officer. Contact details and a copy of this privacy notice are available on the Club website and on the notice board in the Club foyer.