



Harpenden Hockey Club

Data Protection and Privacy Policy

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Introduction

Harpenden Hockey Club (the “club”, “we”, “us”, “our”) collects personal data from our members as part of the membership registration process. This data is needed to provide you with membership services.

This policy is intended to provide information about how the club will use personal data relating to its members, the parents and guardians of members under 18 years old, and supporters. It applies to all personal data we process regardless of the media on which that data is stored.

General Data Protection Regulation (GDPR)

The General Data Protection Regulation came into effect in May 2018.

Under this legislation the club may only collect, process and share personal data for specified, explicit and legitimate purposes. These restrictions are not meant to prevent data processing, but to ensure that we do so fairly and without adversely affecting the data subject.

The club cannot use personal data for new, different or incompatible purposes from that disclosed when it was first obtained unless we have informed the data subject of the new purposes and they have consented to this change of use.

Where the club relies on consent as the grounds for processing personal data the club will need to obtain evidence of this consent and keep records of this so that we can demonstrate compliance with consent requirements.

Your Rights

As a data subject you have the rights to:

- Request a copy of the information we hold about you.
- Update or amend the information we hold about you if it is incorrect.
- Change your communication methods at any time.
- Request the removal of your personal information from our records at any time.
- Raise a concern or complaint about the way in which your information is being used.
- Object to the processing of your data where the club is relying on its legitimate interests as the legal grounds for processing.

If you would like to exercise any of these rights or ask for further information on this policy please contact **the Club Data Manager**.

If you wish to make a complaint about how the club processes your personal data you can contact the Information Commissioner’s Office at: <https://ico.org.uk/make-a-complaint/>

Information We Collect

The club collects the following information from you:

- Forename and Surname*

- Postal address
- Email address*
- Telephone number*
- Date of birth*
- Emergency Contact details*
- Medical Information (Under 18 members only)
- Gender
- Injury Policy Consent (agreement to first aid treatment if required)
- Photographic Policy consent (agreement to be included in photos taken on behalf of the club)
- Publication consent (agreement for name to be published in club communications)

*If this information is not provided then we will not be able to register you at the club and so you will not be able to play hockey for us.

How We Collect This

The club uses Teamo to collect your personal data for our membership records.

Teamo is used for both Senior and Under 18 membership registrations and subscriptions. The Teamo app includes a team management system and chat functionality. The database includes a register function and has the option to include the health information of the members so coaches and managers can have immediate access to this.

Members who play for the Senior teams, and some of the older Junior age groups will also be required to register on England Hockey's Game Management Systems (GMS) as this is the system used by England Hockey for managing their leagues and competitions. The club do not have access to this data, nor do we have any control over it. Data registered on GMS will remain on there for five full seasons after your account has become inactive.

Why We Collect This

The club collects your information to allow the club to be run effectively and efficiently. Processing your data allows us to:

- Maintain an accurate and up to date record of our membership.
- Keep in contact with players and parents / guardians about training, selection and fixtures.
- Share news about the club with our members
- Notify our members about upcoming events organised by the club.
- Send you information about the club.
- Send you information about offers we have obtained from our sponsors and other partners.

Communication from sponsors and other partners will always be sent by the club on their behalf, not directly by them.

Emergency Contact Details are held for all playing members so the club is able to contact someone on your behalf in case of emergency.

Medical information is collected for Under 18s in addition to other data to ensure we can assist you effectively in the event of an emergency whilst you are involved in club related activities. Any medical information provided is used for emergency purposes only.

Consent for various policies is also requested to provide information to the club on how you wish you or your data to be treated in specific circumstances.

Security Of Your Information

The club maintain reasonable, technical, administrative and physical security measures designed to protect your information. Particular care will be taken in protecting sensitive personal data from loss, unauthorised access, use or disclosure.

Data will only be stored within the Teamo application's databases unless there is a specific need for this to not be the case. Employees or members of the club who wish to store member's personal information outside of Teamo, whether on their own personal computer or a cloud-based solution, will only be permitted to do so with the permission of the club's Executive Committee, and only in exceptional circumstances.

If an employee or club member leaves the club all personal data they hold relating to other members must be returned to the club or deleted depending on the wishes of the Executive Committee.

Who Has Access To Your Data

Access to your personal information will be restricted to members holding specific roles within the club as in the below table:

Role	Level of access	Rationale for access
Secretary	All data for all club members*	Send out club communications
Treasurer	Financial information for all members	Ensure membership and match fees paid
Club Data Manager (data controller)	All data for all club members*	App administration
Welfare Officer	All data for all club members*	Monitor communications
Ladies' Club Captain	All data relating to Ladies' section members	Management of the ladies' section
Men's Club Captain	All data relating to Men's section members	Management of the men's section
Junior Coordinator	All data relating to members Under 18 and their parents or guardians*	Send out communications to junior members
Head of junior hockey	All data relating to members Under 18 and their parents or guardians*	Management of the junior section
Umpire Liaison Officer	All data relating to the club's umpires	Umpire management
Lead Coaches	All data relating to the members of the team(s) they coach*	Team management
Senior team captains	All data relating to the members of their teams	Team selection and communications

*Teamo does not allow anyone to see contact information for members Under 18 years old. Only contact details for their parents and emergency contacts are available to these roles for these members.

These access permissions have been approved by the club's Executive Committee. The Club Data Manager is the only person with authority to grant / remove enhanced access permissions for members. The Club Data Manager will review who has enhanced access permissions regularly. This will also be reviewed at least quarterly by the Executive Committee.

Role holders whose role gives access to personal data for members Under 18 years old will only be given the permissions relevant to their role once they have satisfactorily completed an Enhanced DBS check,

If a member with enhanced permissions leaves their role their enhanced permissions will be removed as soon as possible after they leave their role.

How Long We Retain Your Data For

The club must ensure that when personal data is no longer needed for its specified purposes it is either deleted or anonymised.

The club has no reason to keep records of members who no longer wish to play for, or be contacted by, the club. At any time a member can request for their membership to be terminated, in which case all their personal information will be deleted by the club.

In addition to this, before a new season starts all members will be sent a declaration within Teamo asking them to confirm if they intend to remain a member for the following season. Any members who indicate that they will be leaving or don't respond will have their Teamo account, and the associated personal information, deleted shortly after the season begins.

Any member entering further education who may wish to train with or play for the club between terms can request to have their Teamo records put on hold if they don't want it to be deleted. The list of on hold members will be reviewed regularly to ensure this status is still accurate for all members on it.

Removing Your Data

Members can request for their data to be removed at any time. Requests should be made in writing to **Club Data Manager**.

Members requesting for data to be removed should be aware that deleting their entire account, or the mandatory data held within it, will mean that they are no longer eligible to play for the club.