

BRADFORD AND DISTRICT TENNIS ASSOCIATION

General Data Protection Regulation Policy



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Introduction

Bradford and District Tennis Association is managed and run by volunteer club representatives on behalf of Tennis Clubs in the Association. As part of the General Data Protection Regulations (GDPR) which became law on the 25th May 2018 the representatives have reviewed the Association's Data Protection Policy. This document sets out the policy regarding:

- The type of data held and purpose for holding the data
- Permissions required from Club Representatives and Team Captains to use their personal data
- Actions that will be taken if there is a request for access to a Club Representative's or Team Captain's data
- The process in place to correct any errors in a Club Representative's or Team Captain's information
- The storage of data and access to the information

Overview of the GDPR regulations

GDPR has been introduced by the EU to tighten the rules around holding and processing data (personal information). The regulations allow more rights to individuals and place specific requirements on organisations holding and processing data.

The GDPR regulation principles

Under the GDPR regulations which became law in May 2018 there are 8 principles:

1. Data is processed lawfully, fairly and in a transparent manner in relation to individuals.
2. Data is collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be considered to be incompatible with the initial purposes.
3. Data is adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.
4. Data is accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that is inaccurate, having regard to the purposes for which it is processed, is erased or rectified without delay.
5. Data is kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data is processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes subject to implementation of the appropriate technical and organisational measures required by the GDPR in order to safeguard the rights and freedoms of individuals.
6. Personal data shall be processed in accordance with the rights of data subjects under the Data Protection Act 1998 and from 25th May 2018 the General Data Protection Regulations.
7. Data is processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.
8. Personal data shall not be transferred to a country or territory outside the European Economic Area unless that country or territory ensures an adequate level of protection for the rights and freedoms of data subjects in relation to the processing of personal data

GDPR rights for individuals

1. The right to be informed
 - The right to be informed encompasses our obligation to provide 'fair processing information', typically through a privacy notice.
 - It emphasises the need for transparency over how we use personal data.
2. The right of access
 - Individuals have the right to access their personal data and supplementary information.
 - The right of access allows individuals to be aware of and verify the lawfulness of the processing.
3. The right to rectification
 - The GDPR gives individuals the right to have personal data rectified.
 - Personal data can be rectified if it is inaccurate or incomplete.
4. The right to erasure
 - The right to erasure is also known as 'the right to be forgotten'.
 - The broad principle underpinning this right is to enable an individual to request the deletion or removal of personal data where there is no compelling reason for its continued processing.
5. The right to restrict processing
 - Individuals have a right to 'block' or suppress processing of personal data.
 - When processing is restricted, we are permitted to store the personal data, but not further process it.
 - We can retain just enough information about the individual to ensure that the restriction is respected in future.
6. The right to data portability
 - The right to data portability allows individuals to obtain and reuse their personal data for their own purposes across different services.
 - It allows them to move, copy or transfer personal data easily from one IT environment to another in a safe and secure way, without hindrance to usability.
 - Some organisations in the UK already offer data portability through the midata and similar initiatives which allow individuals to view, access and use their personal consumption and transaction data in a way that is portable and safe.
 - It enables consumers to take advantage of applications and services which can use this data to find them a better deal, or help them understand their spending habits.
7. The right to object

Individuals have the right to object to:

 - processing based on legitimate interests or the performance of a task in the public interest/exercise of official authority (including profiling);

- direct marketing (including profiling); and
 - processing for purposes of scientific/historical research and statistics.
8. Rights in relation to automated decision making and profiling.
- The GDPR has provisions on:
- automated individual decision-making (making a decision solely by automated means without any human involvement)
 - profiling (automated processing of personal data to evaluate certain things about an individual). Profiling can be part of an automated decision-making process.
 - The GDPR applies to all automated individual decision-making and profiling.
 - Article 22 of the GDPR has additional rules to protect individuals if you are carrying out solely automated decision-making that has legal or similarly significant effects on them.
 - You can only carry out this type of decision-making where the decision is:
 - necessary for the entry into or performance of a contract; or
 - authorised by Union or Member state law applicable to the controller; or
 - based on the individual's explicit consent.
 - You must identify whether any of your processing falls under Article 22 and, if so, make sure that you:
 - give individuals information about the processing;
 - introduce simple ways for them to request human intervention or challenge a decision;
 - carry out regular checks to make sure that your systems are working as intended.

Bradford and District Tennis Association - Data Protection Policy

Our data protection policy sets out our commitment to protecting personal data and how we implement that commitment with regards to the collection and use of personal data.

We are committed to:

- Ensuring that we comply with the eight data protection principles, as listed above
- Meeting our legal obligations as laid down by the Data Protection Act 1998 and the General Data Protection Regulations from 25th May 2018
- Ensuring that data is collected and used fairly and lawfully
- Processing personal data only in order to meet our operational needs or fulfil legal requirements
- Taking steps to ensure that personal data is up to date and accurate
- Establishing appropriate retention periods for personal data
- Ensuring that data subjects' rights can be appropriately exercised
- Providing adequate security measures to protect personal data
- Ensuring that a nominated Association officer is responsible for data protection compliance and provides a point of contact for all data protection issues
- Ensuring that all Association officers are made aware of good practice in data protection
- Providing adequate training for all responsible for personal data
- Ensuring that everyone handling personal data knows where to find further guidance
- Ensuring that queries about data protection, internal and external to the Association, are dealt with effectively and promptly
- Regularly reviewing data protection procedures and guidelines within the Association

The impact of GDPR on the Bradford and District Tennis Association

As an Association for the League we have a duty to ensure we meet the requirements of GDPR by obtaining, protecting and using personal data of our Club Representatives and Team Captains correctly. An impact assessment has been conducted to address GDPR with our Association.

The gathering of data:

- Electronic Team Registration form from clubs. Provided annually before the start of the tennis season
- Team Captain information input on the Tennis Association website

The data held by the Association Secretary (Data Controller) is as follows:

Club Representatives name(s)

Club Team Captain name(s)

Address & Post Code of the respective Tennis Clubs

Home telephone number of:

- Team Captain(s)
- Club Representative(s)
- Officers of the Association

Mobile telephone number of:

- Team Captain(s)
- Club Representative(s)
- Officers of the Association

Email Address(es) of:

- Team Captain(s) (on the website)
- Club Representative(s)
- Officers of the Association

The data is used to:

- To annually compile a printed list that is distributed to all Club Representatives and Team Captains.
- To create a printed list on the Bradford and District Tennis Association website.
- To create and maintain an Email Address List which is used to:
 - give Club Representatives and Team Captains regular updates
 - enable Team Captains, Association Officers and Club Representatives to contact each other, as and when appropriate.

Association procedures to comply with GDPR

Gathering Data

The data captured is:

Club Representatives name(s)

Club Team Captain name(s)

Address & Post Code of the respective Tennis Clubs

Home telephone number of:

- Team Captain(s)
- Club Representative(s)
- Officers of the Association

Mobile telephone number of:

- Team Captain(s)
- Club Representative(s)
- Officers of the Association

Email Address(es) of:

- Team Captain(s) (on the website)
- Club Representative(s)
- Officers of the Association

All this information is relevant and appropriate for the Association to maintain a record of club contacts.

The data is obtained on an Electronic Team Registration form from clubs. Provided annually before the start of the tennis season. See appendix 1.

The Club Representative and Team Captain information is recorded on the Tennis Association website

There is a Data Protection statement and 'opt-in' boxes on the form regarding the retention and use of the data.

The Data Protection statement is:

Bradford and District Tennis Association will use your personal data and that of your Team Captains for the purposes of your clubs involvement in Bradford and District Tennis Association activities. Your data will not be shared with any third party and the principles of the General Data Protection Regulations will be adhered to.

Opt-in declaration:

By typing "Y" in this box I consent to my name and telephone number(s), along with the information of our Team Captains being added to Association's list of contacts which is sent out to all clubs. I confirm I have received consent from all parties to provide their information to the Association.

By typing "Y" in this box I and the Team Captains consent to receiving information about the Association by post, email/MMS, online or by phone.

Data storage

Data is held at the home premises of the Data Controller. The data is held in:

- A spreadsheet which will be dated and version controlled – 2020 version x
- electronic or paper team registration forms
- Security
The spreadsheet is password protected. The password is only known by the data Controller and shared with the Chairman, Vice Chairman, Treasurer, Fixture Secretary and Committee members, as and when required.

If the spreadsheet is emailed to selected parties, as detailed above, the password will be sent by separate email. The parties are instructed and must agree that the details will not be shared with any other parties and that the document will remain password protected.

The electronic and paper annual team registration forms are stored with the Data Controller in a membership folder.

- Data retention
Information on the spreadsheet will be held until a Club Representative or Team Captain is replaced. The information will then be deleted from the spreadsheet and the website.

Team registration forms will be held for 12 months.

Using data

Data is used:

- to create an annual list of Club Captains and Team Representatives that is distributed to each club
- to send regular newsletter updates by email -
all emails will be issued to members using 'Bcc' to ensure the addresses are not published
- by officials of the Association to communicate with Team Captains and Club Representatives
- by Team Captains to arrange and manage their matches.

Data is not issued to any third parties or used for marketing purposes.

Deleting data

When a Club Representative or Team Captain does not continue in their role, their data will be deleted from Association records:

- spreadsheet of Association data
The old version of the spreadsheet will be deleted from the Data Controller's computer and a new version saved.
- The Association website

Team Registration forms will be held for 12 months. Annually, once new forms are received, the old forms will be destroyed. The paper forms will be either shredded or burnt.

A list for each year will be held securely by the Data Controller. The lists provide a historic record of the Association for archive purposes.

Club Representatives and Team Captains' access to their data

At any time, a Club Representative or Team Captain can ask the Data Controller (Association Secretary) to show them the data held by the Association. If there any errors or discrepancies in the information the Data Controller will ensure the information is accurate.

Any Club Representative or Team Captain requesting details of their data will be provided with the content, via email or post, within 30 days of the request being made.

Club Representatives and Team Captains can request their data is deleted from the Association records on the cancellation of role in the Association.

Website

Permission to publish the names and telephone numbers of club officials on the website must be obtained. Once obtained permission will be deemed to be granted until the club official ceases their role.

Appendix 1

Bradford and District Tennis Association
...2020 season

Registration form

Name of Club:

Number of teams to be entered this season:

Men's: Ladies: Juniors: U15's: U18's:
(Players must be under the age of 15 or 18 on 1st April).

Club representative:

Name

Address

.....

Postcode Tel no.

Email address

Address and postcode of playing venue:

.....

.....

.....

.....

Team Captains

	Name	Tel nos.
Men		
1
2
3
4
Ladies		
1
2
3
4

Juniors	Adult contacts
U15's
U18's

TENNIS BALL ORDERS

By now you should have received an email from Mark Hagel regarding your ball requirements for 2020. Please place your orders directly with him: cjrackets@aol.com or tel:07717373558

Please email the completed registration form by 15th January to Glenn Frost at glenn.frost@hotmail.co.uk , post it to Glenn Frost, Lingfield House, Ickornshaw, Cowling, W. Yorks. BD22 0DE or bring completed form to AGM on 22nd January 2020.

Name of Club:

Name of Club Representative:

Bradford and District Tennis Association will use your personal data and that of your Team Captains for the purposes of your clubs involvement in Bradford and District Tennis Association activities. Your data will not be shared with any third party and the principles of the General Data Protection Regulations will be adhered to.

Opt-in declaration:

By typing "Y" in this box I consent to my name and telephone number(s), along with the information of our Team Captains being added to Association's list of contacts which is sent out to all clubs. I confirm I have received consent from all parties to provide their information to the Association.

By typing "Y" in this box I and the Team Captains consent to receiving information about the Association by post, email/MMS, online or by phone.