

# **Vikings Cheerleading**

## **General Data Protection Regulation (GDPR) Policy**

### **2018**

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# 1. What is GDPR

General Data Protection Regulation (GDPR) came into force on the 25<sup>th</sup> May 2018. GDPR basically gives increased privacy rights to individuals whose data is being collected.

When we collect, use, share, or retain your personal information (known as 'processing') we are regulated under the General Data Protection Regulation (GDPR) and are responsible as 'controller' of your information.

This applies to you if you are:

- An existing or prospective member of our club
- A person with parental responsibility for a member
- An existing or prospective club volunteer or staff member

## 2. Policy Statement

Vikings Cheerleading is committed to a policy of protecting the rights and privacy of individuals, members, volunteers staff and others in accordance with The Data Protection Act 1998. The policy applies to all voluntary, members and staff at the club. Any breach of The Data Protection Act 1998 or The club's Data Protection / GDPR Policy is considered to be an offence and in that event, disciplinary procedures apply.

**We take your privacy seriously and will ensure your personal information is kept secure.**

## 3. Collected Information

The club will monitor the data held for our purposes, ensuring we hold neither too much nor too little data in respect of the individuals about whom the data are held. If data given or obtained are excessive for such purpose, they will be immediately deleted or destroyed.

The categories of personal information we process includes:

- Athlete details - name, gender, date of birth, contact information
- Emergency contacts
- Health Records - any existing medical conditions, allergies, disabilities, medication etc.
- Other relevant individual needs for example; information about learning, religious, other support needs, or details of any reasonable adjustments to support your individual needs.
- Athlete attendance and achievement records
- Any communications from, to or relating to you
- Signed registration form with Code of Conduct agreement
- Details relating to standards of conduct

- Any accident or incident reports including details of injuries
- Bank details (If you are making regular payments to us or we are making payments to you e.g. staff)
- Experience, qualifications, training and confirmation that you have completed a DBS check (prospective or existing staff and volunteers)
- Uniform and merchandise sizes

If you attend an event or trip with the club, we will also collect the following information where relevant:

- Dietary requirements and any other relevant information that we need to know to ensure your needs are met
- Passport information if the trip is abroad

Please note that any information specifically for the purpose of a trip (i.e. passport information) will be destroyed upon completion of the trip). Where possible, we will avoid storing this data.

The data will be collected directly from members, parents/guardians. The data collected will be shared with staff at Vikings Cheerleading and (when necessary) Event Providers and any hotels at which the team will be staying at for competitions.

**It is your choice whether you provide all the information we have requested but not providing information may affect our ability to meet you or your child's needs and to protect their well-being.**

## 4. Purpose of data held by Vikings Cheerleading

GDPR requires Vikings Cheerleading to document why we need to lawfully process people's data. This includes the information we keep, what it is being used for and our reasons for needing it.

We have the following reasons for processing people's data –

- Legal - we have the following legal obligations for processing data which include but are not limited to health and safety, insurance and child protection.
- Contractual - which allows the club to provide members with the services associated with our programme such as sending requests for payment, registers, and entrance to events.
- Legitimate interests – which is when the processing is necessary for the club's legitimate interests such as but not limited to marketing.
- Consent – Is when the individual has given clear consent for you to process their personal data for a specific purpose. For example taking photographs for academy website.

When you tell us about any special needs such as disabilities or other support information we may use relevant information to comply with our legal obligations under the Equality Act 2010. We will review any information you have provided to help us identify any actions we can take to support inclusion. We may need to ask you for more information to help us to best meet your or your child's needs. We will keep a record of any steps we take to support inclusion.

If you are wishing to volunteer or work for us, we may need to ask you to complete a DBS check as we have a legal obligation to do so. We jointly control the checking process with other bodies who is responsible for the assessment of any content on the check and will only share information with us where it is appropriate. For example, if you are considered by the other body to be unsuitable to take on the role, we may share relevant and proportionate information about criminal offences where it is deemed that while you are not considered unsuitable to take on the role, if it is considered necessary for safeguarding purposes.

We have assessed the above criteria to ensure a balance between the club's interests and your individual interests, rights and freedoms with appropriate safeguards, especially to protect the interest of data subjects who are children.

You have a right to object to the use of your information for any purposes we undertake based on legitimate interests. Further information is provided in the section below on individual rights.

## 5. Consent

We rely on consent in the following circumstances:

- To take photographs and videos at club events or training to promote the club on our website, club social media accounts and in communications. All film and photos of children will be published in line with our social media policy.
- For a 'TeamApp' account to be made on your behalf. This is where data such as emergency contact information, medical conditions etc. is stored for each athlete. TeamApp is used for all communication throughout the club.
- Special categories of personal data, see below.

When you have given us your consent for your personal information to be used for a particular purpose, you have the right to withdraw this consent at any time, which you may do by contacting us using the contact details below. Your withdrawal of consent will not affect any use of the data that was made before you withdrew your consent.

Special categories of personal data are a category of information that is more sensitive and requires greater protection. Some of the information we process falls into this category (e.g. health/medical data or any information you provide to us about a disability, your religion, race or gender identity). It is unlawful for organisations to process this type of information unless an

additional legal condition applies. We will only process this type of information if one of the following applies:

- You have given your explicit consent or have made this information public
- We are required to do so to establish, exercise or defend a legal claim
- We are required to do so to comply with employment or social security or social protection law
- Legitimate activities of a 'not for profit' organisation
  
- It is in your vital interests and you are unable to provide consent e.g. if you are unconscious or do not have sufficient mental capacity.

## 6. Processing Data

We have a legitimate interest in sharing a limited amount of personal information with competition Event Providers (EPs) to allow you to compete and so that relevant support and access can be offered if necessary. (e.g. Name, DOB, severe medical conditions, disabilities).

We may also be required to share your personal information in the following reasons:

- Complying with legal and/or regulatory responsibilities
  - We may be required to share information with bodies such as Her Majesty's Revenue & Customs (HMRC), Health & Safety Executive (HSE), Police and Information Commissioner's Office (ICO). We may also share information with other organisations to safeguard children. Any information that is shared will be strictly limited to what is required to ensure children are protected from harm and will be carried out in accordance with the law and relevant government guidance.
- Insurance
- Obtaining legal or professional advice
- Obtaining a service from a third party

All service providers are contractually required to ensure your information is secure and cannot use this information for their own purposes. Where we are required to share information with them to provide the service, we only disclose information that is strictly necessary to deliver the service.

Except for the above, will only share your information with any other third parties with your prior agreement.

## 7. Data Storage

The club only holds necessary data on its members. When a member joins the club they will be asked to complete a registration form. This asks for the athletes basic information, an emergency contact form, photography and videography permission, the club constitution and the disclaimer. Once this is completed, the information is stored online in secure files that are

password protected. The information will also be transferred to TeamApp - an online service meant to streamline communication between a club and its community. Additional data stored online includes registrations and payments.

## 8. The EEA

Data must not be transferred to countries outside the European Economic Area without the explicit consent of the individual. The club takes particular care to be aware of this when publishing information on the Internet, which can be accessed from anywhere in the globe.

## 9. Security

Appropriate technical and organisational measures shall be taken against unauthorised or unlawful processing of personal data and against accidental loss or destruction of data.

All staff laptops are password protected and Vikings Cheerleading's online data store requires an additional log on. Only the club Directors have full access to the information stored within the Drive. When staff members are using the laptop computers out of the office care should always be taken to ensure that personal data on screen is not visible to strangers.

## 10. Legal Requirements and Individual rights

Data is protected by the Data Protection Act 1998, which came into effect on 1 March 2000. Its purpose is to protect the rights and privacy of individuals and to ensure that personal data are not processed without their knowledge, and, wherever possible, is processed without their consent.

The Act requires us to register the fact that we hold personal data and to acknowledge the right of 'subject access' – voluntary and academy members and staff must have the right to copies of their own data.

You have important rights under data protection law. In summary these include:

**To be informed about how your information is processed** (set out above)

**To access any personal data held about you.** You have the right to access the personal information we hold about you. You can log into 'TeamApp' at any time to view/amend/delete the information we hold about you that has been collected. You can also request a copy of any other information we hold by writing to us using the contact details below.

**To have your data rectified if it is inaccurate.** If you think that any of the information we hold is inaccurate, you can ask that corrections are made. We will either make the requested amendments or provide an explanation as to why we are not making changes.

**To have your data deleted (except if there is a valid lawful reason to retain it).** If you cease to have a relationship with the club, we will delete any personal information you provided within two years except for any financial/accounting records which need to be retained for six years in line with UK tax law. Additional information (i.e. passport information) that has been provided solely for the purpose of participating in a specific activity will be deleted after the event. Video footage that has only been taken for coaching purposes will be retained only for as long as it is required for that purpose.

You have a right to request the deletion of your information in advance of the above retention periods. We will delete this information unless there is a lawful reason for the information to be retained.

**To have your information restricted or blocked from processing.** If you object to processing, we will restrict the processing of your information for the purpose to which you are objecting whilst we review your objection.

**To object to:**

- Any processing based on legitimate interests. The right to object is specific to the data subject's particular situation. We will stop processing your personal data unless we can demonstrate compelling legitimate grounds for the processing, which override your individual interests, rights and freedoms or we need to continue to process your information in connection with a legal claim.
- Your personal information being used for direct marketing activities. You can object to our direct marketing activities by unsubscribing from the relevant communication as described above in the marketing section of this notice.

While we hope to be able to resolve any concerns you have about the way that we are processing your personal data.

## 11. Summary

This privacy policy was published on 30/08/2018 and last updated on 30/08/2018.

We may change this privacy notice from time to time, the updated policy will always be available on request and via our website.

To exercise any of your rights or if you have any questions about our privacy notice please contact our Data Protection Officer -

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