

Exeter Harriers Data Protection and Privacy Policy

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Introduction

For the purposes of data protection legislation, EH is a data controller.

Exeter Harriers are committed to protecting your privacy and processing your personal data in accordance with the Data Protection Act (DPA) 1998 up to 24 May 2018 and the General Data Protection Regulation (GDPR) on and from 25 May 2018 (Data Protection Legislation). This policy explains how the information we collect about you is used and kept securely. It also explains your privacy choices when using our website as well as your right to access your information under Data Protection Legislation.

Scope

This policy applies to all members and coaches affiliated to Exeter Harriers. You must be familiar with this policy and comply with its terms.

This policy should also be read in conjunction with Exeter Harriers Privacy Statement. We may supplement or amend this policy by additional policies and guidelines from time to time. Any new or modified policy will be circulated before being adopted.

Who is responsible for this policy?

As our Data Protection Officer (DPO), Susan Starr has overall responsibility for the day-to-day implementation of this policy. The DPO responsibilities are to

- Keeping the board updated about data protection responsibilities, risks and issues
- Reviewing all data protection procedures and policies on a regular basis

- Arranging data protection training and advice for all members and those included in this policy
- Answering questions on data protection from board members and other appropriate persons
- Responding to individuals who wish to know which data is being held on them by Exeter Harriers
- Checking and approving with third parties that handle the company's data any contracts or agreement regarding data processing
- The DPO will work in conjunction with an IT officer who will ensure that all systems, services, software and equipment meet acceptable security standards and ensuring that third party services are compliant.

The information we collect about you

We may collect the following information about you through our website or in person:

- Your name, email address, postal address, results and any other information you voluntarily provide to us via our website and other forms, see Privacy Statement.
- In becoming a member, volunteer, coach or official of EH, EH will collect certain information about you which will include your name, date of birth, gender, URN number, email address, address, telephone number, names of the EA affiliated clubs that you are a member of and details of any coaching or officiating licenses, DBS licences, safeguarding course attendance dates you have and competition results **(Athletics Data)**.

The information provided to us

We may be provided with information about you from clubs with which you are registered.

That information will include: name, date of birth, gender, email address, address, telephone number, name of the Clubs with which you are registered and any coaching or officiating licenses that you hold.

Personal data

You must take reasonable steps to ensure that personal data we hold about you is accurate and updated as required. For example, if your personal circumstances change, please inform the Data Protection Officer so that they can update your records.

Children

Only children aged 13 years and over may lawfully provide their own consent for the processing of their personal data in the UK accordingly an adult with parental responsibility must provide consent for processing if the child is under 13; and in cases where the child is between the age of 13 -18 consent from both parent and child should be obtained.

How we use your information

We may use your personal information for a number of purposes, including:

- To deal with your requests and enquiries.
- To contact you for reasons related to your enquiry.
- To notify you about Athletics Events.
- To record and publish registration, entry and results for competitions and events
- To be used by coaches and authorised volunteers to organise training and other matters

Our legal bases for processing your information

We will process your Data on the basis of the following legitimate interests:

- To check and validate data to support administrative processes. For example: transfer of URN, name and date of birth via an API to check licence validation at point of entry to competitions and events and transfer of URN, name and date of birth via secure link to Power of 10 to match against competition results
- Providing relevant and necessary information via email, text, post to you about competitions and events.

If you become a registered athlete with EH, we will share your Athletics Data with the following bodies as part of the administration of your involvement in the sport: UK Athletics, England Athletics other Home Country Athletic Organisations, selected members of the National Council, Regional Councils, County Athletics Association and / or Area Athletics Association and third-party data managers that we appoint as data processors as part of administering your involvement in sport. We will also share data with Power of 10 which is a body that provides a comprehensive results and rankings service for the sport of athletics. We will not transfer your data to any other third parties without obtaining your consent and, where possible, will anonymise your data before sharing. We will also not share any other personal data you provide to us that is not Athletics Data.

If we wish to share your data with third parties for marketing purposes, we will tell you about this and only do so if we get your consent.

EH may also share your personal information with the police and other law enforcement agencies for the purposes of crime prevention or detection. If we disclose your information, we ask the organisation to demonstrate that the data will assist in the prevention or detection of crime, or that EH is legally obliged to disclose it. This is done on a strictly case by case basis and through a tightly controlled process to ensure we comply with Data Protection Legislation.

We will also process your details on the basis of consent. You enter into a data protection agreement with us on becoming a temporary or permanent member and this agreement is on the membership form completed on joining.

Protecting your information

Storage of Data

- In cases when data is stored on printed paper, it will be kept in a secure place where unauthorised personnel cannot access it.
- Printed data will be securely shredded when it is no longer needed
- Data stored on computers will be protected by strong passwords that are changed regularly.
- Data stored on CDs or memory sticks must be locked away securely when they are not being used
- The DPO must approve any cloud used to store data
- Servers containing personal data must be kept in a secure location on site or with an approved third party IT provider
- Data should be regularly backed up
- If data is stored directly to mobile devices such as laptops, tablets or smartphones or to equipment not belonging to Exeter Harriers will have to have file encryption.
- All servers containing sensitive data must be approved and protected by security software and a firewall.

The data that we collect from you may be transferred to a destination external to EH's own secure network. By submitting your personal data, you agree to this transfer, storing or processing. We will take all reasonable steps to ensure that your data is treated securely and in accordance with this privacy policy. The Internet is not generally a secure medium for communication and therefore we cannot guarantee the security of any information you send to us over the Internet. We use up-to-date industry procedures to protect your personal information.

Finding out what information EH holds about you

Under the Data Protection Legislation, you can ask to see any personal information that we hold about you. Such requests are called subject access requests. If you would like to make a subject access request, please contact the EH's Data Protection Officer: Data Protection Officer, Exeter Harriers, The Pavilion, Summer Lane, Exeter, Devon, EX4 8NT.

You will also need to provide two forms of identification, for example, driving licence, utility bill or passport and, if appropriate, any particulars about the source or location of the information you are requesting.

Removal of Data

A data subject may request that any information held on them is deleted or removed, and any third parties who process or use that data must also comply with the request.

Data retention

Any data that we collect from you will be deleted in accordance with timescales set out below:

Type of Info	Date of Deletion
Athletics data	2 years after an individual has not played an active part in athletics
Membership forms	2 years
Registration lists, entry forms and results for EH open meetings	12 months
Club records	Held indefinitely for historical archive purposes.

Reporting breaches

All members, coaches and volunteers have an obligation to report actual or potential data protection compliance failures. This allows us to:

- Investigate the failure and take remedial steps if necessary
- Maintain a register of compliance failures
- Notify the Supervisory Authority (SA) of any compliance failures that are material either in their own right or as part of a pattern of failures

Monitoring

Everyone must observe this policy. The DPO has overall responsibility for this policy. They will monitor it regularly to make sure it is being adhered to.

Training

All members, coaches and volunteers must be aware of the policy and will receive relevant advice and/or training on this policy. Further training will be provided at least every two years or whenever there is a substantial change in the law or our policy and procedure.

Training is provided through an in-house programme during one of the board meetings.

It will cover:

- The law relating to data protection
- Our data protection and related policies and procedures.

Completion of training is compulsory.

Changes to our Privacy Policy

We regularly review our Privacy Policy and updates will appear on this page when necessary. This Privacy Policy was last updated in January 2018.

Contacting Exeter Harriers about this Privacy Policy

If you have any questions or comments about this Privacy Policy please write to us: Exeter Harriers, The Pavilion, Summer Lane, Exeter, Devon, EX4 8NT