

Petanque Devon

Data Privacy: a statement

Devon Pétanque is committed to safe and transparent storage and use of data on individual members, irrespective of the form in which the data is held, and will always comply with the *General Data Protection Regulation (GDPR)*. Under this legislation, individuals are entitled to know what data an organisation keeps on them, to receive assurances about its storage and use – and to have the chance to change it or in some circumstances object to or restrict how data is used and even have it removed altogether. Devon Pétanque will not keep such data longer than is necessary for its stated purposes and to comply with legal requirements. More detail on GDPR is given in the section **GDPR principles** below.

Regional records contain the following information:

- 1) *Members' names, addresses, dates of birth, gender, email addresses, phone numbers, licence numbers and clubs belonged to.* Such information on the Region's Pétanque England members, stored by PE, is transmitted back to the Regional Membership Secretary, who then shares it with the Regional Secretary and the President. This information is kept on computers protected by industry standard technologies and security and such data will not be transferred onwards to third parties for commercial or advertising purposes. Any breach of data security will be notifiable to individual members.
- 2) *Minutes of Regional meetings.* These are compiled and kept by the Regional Secretary, shared with the Regional Committee and with the PE registered members of the Region. Such minutes are circulated to members by email and may appear on the Region's website. The same stipulations about computer security as above apply.
- 3) *Records of competition participation and success.* These are compiled by competition organisers and/or the Regional Committee, minuted and put on the Regional website; they may also be notified to members by the President via email, and also to the local press. They may include name, date, venue of competitions, personal results and rankings. Members have the option to withhold consent for press publicity.
- 4) *Photographs of members.* These may appear on the Region's website, on emails and in the local press; consent may be withheld by individuals.
- 5) *Other administrative data relating to individuals.* This may include sensitive data such as the outcome of disciplinary hearings. Such information will be available to management committee members only.

N.B The Region does not maintain financial records relating to individual membership; this is a responsibility of PE, but the Devon Membership Secretary has a view of them via access to PE membership records; these do not include bank card or account data.

In addition to records kept by Devon Petanque, individual clubs will maintain data on individuals, probably in the categories outlined above but possibly extending to emergency contact numbers and, in some cases, medical information. A proportion of these members will not be PE members but will be known only to the club, which has GDPR responsibilities for all local records, online and paper, and should compile a data

privacy statement on the lines of the Region's above. Clubs should also be aware that serious compliance failure may incur a fine from the Information commission, and that individuals may sue for compensation for a GDPR breach. See under **Club obligations** below for more detail.

Pétanque England has issued a set of data privacy guidelines for the data on individuals it keeps, which can be viewed at: http://www.englishpetanque.org.uk/documents/Data_policy.pdf . It is however left to the regions and to their clubs to draw up their own data privacy statements.

GPDR principles

The six principles of the GDPR require that personal data shall be:

- processed lawfully, fairly and in a transparent manner in relation to individuals;
- 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;
- adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
- accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay;
- kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are 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 organizational measures required by the GDPR in order to safeguard the rights and freedoms of individuals; and
- 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.

Club obligations

In order to comply with GDPR principles, Clubs need to:

- ensure they identify a lawful basis to process the personal data and provide a privacy notice to the individual, which tells individuals how the club uses their personal data (template available);
- only collect, use and keep personal data for specific purposes – i.e. only use a member's personal data for membership purposes;
- only collect, use and keep personal data that is actually need;
- keep personal data up-to-date where possible;
- only keep personal data for as long as needed – i.e. when a member leaves a federation, region or club, they should review all the member's personal data held to see whether they still need it after a specific period of time (for example, three years); and
- protect personal data and keep it secure.

What information do Clubs need to keep?

Clubs should keep a document (such as a spreadsheet or table) recording the following:

- the purposes of processing – for membership, competitions, training, etc.;
- the categories of individuals and personal data – members, volunteers, etc. and name, address, date of birth, etc.;
- the categories of recipients – details of who the Club shares personal data with, such as the region, Pétanque England etc.;
- details of any personal data if transferred or hosted outside the EU safeguards;
- retention periods – how long different records of personal data are kept; and
- details of security measures in place to keep personal data secure – for example, passwords, locked cabinets, restricted accounts, etc.

Clubs should also keep copies of privacy notices and consent statements, so they can evidence that these have been provided to individuals.

Suggested action plan for Clubs:

- Identify all personal data that is held by the club and what it is used for – create a table or spreadsheet, which can be used to maintain the required records of processing activities.
- Create privacy notices and update club forms, websites, etc. to include the new privacy notices and issue these to current members, employees, etc.
- Ensure that everyone within the club with access to personal data held by the club has a basic understanding of data protection and the club's obligations under the GDPR.
- Adopt higher standards of data security – for example, good practice would be to create specific club email accounts to limit the use of personal email accounts for club business.
- Get suppliers to sign up to written data processing contracts.