

# Norfolk County Indoor Bowling Association



## General Data Protection Regulation (GDPR) PRIVACY POLICY Policy adopted: 25<sup>th</sup> May 2018 Latest update 18<sup>th</sup> August 2018

### Introduction

This policy applies to personal information collected by NORFOLK COUNTY INDOOR BOWLING ASSOCIATION (NCIBA) and sets out the principles governing our processing of that information, in the way we use, keep secure and disclose it under the General Data Protection Regulations (2018). Your personal information that is necessary for us to operate your Club affiliation and individual membership includes given and last names, address, post code, telephone and/or mobile numbers, email address and in some circumstances date of birth.

The Regulations covers the storage and use of Personal Data which is defined "*as any piece of personal information that can be used to identify an individual, either directly or indirectly. This includes such information such as name, home address, home telephone number, mobile phone number, e-mail address and date of birth*"

The advice given is that "*GDPR states that Personal Data can be held, **without the need for consent**, if it is adequate/relevant/non-excessive*". This means that as long as the County Association reasonably considers the storage of Personal Data to be relevant and non-excessive, they can continue to hold it without the need for consent.

The intention of this Policy is to demonstrate how we endeavour to comply with the General Data Protection Regulations (2018).

We are committed to respecting your privacy. This Policy is to explain how we may use personal information we collect before, during and after your affiliation/membership with us. This also explains how we comply with the law on data protection, what your rights are and for the purposes of data protection as detailed below we will be the controller of any of your personal information.

# Norfolk County Indoor Bowling Association

This Policy applies to you if you are a member of a Club affiliated to the Norfolk County Indoor Bowling Association or any person who has communicated with us with regarding the services provided by us.

References to **we, our or us** in this Policy are to Norfolk County Indoor Bowling Association.

## 1. Data Controllers

The Data Controllers for the Norfolk County Indoor Bowling Association are the Secretary, Assistant Secretary, Treasurer, League Secretary, Match Secretaries and Competition Secretary. The County has not formally appointed a Data Protection Officer. These duties will be undertaken by the Data Controllers.

## 2. How do we collect and use this personal information?

All the information collected is obtained directly from County Officers, Club Officers and Club members and other persons who may contact us. This is at the point the personal information is provided. We limit the collection and use of personal information to that which is adequate, relevant and non-excessive and will process and use the information for:-

- a) use by County Officers to enable the proper administration of the Norfolk County Indoor Bowling Association
- b) use by Clubs affiliated to Norfolk County Indoor Bowling Association and its members by way of the information shown on our Website ([www.nciba.org.uk](http://www.nciba.org.uk))
- c) use by our National Governing body, EIBA Ltd and other relevant bowling Associations to enable their proper administration.

Details of the information held, where it is held, how it is held, who has access to it and with whom it is shared is available on request to the County Secretary. If we make material changes to what we hold, use and share we will seek permission.

## 3. Timescale

We will store the information electronically and in paper-based form from the point of collection for as long as you are an affiliated Club of the Norfolk County Indoor Bowling Association or a current member of an affiliated club. After you cease to be an affiliated Club or advise us that you are no longer a member of an affiliated Club, the information will be retained for a period of 3 months before being deleted or destroyed.

# Norfolk County Indoor Bowling Association

## 4. Opt-out choice

You have the right to withdraw at any time your agreement to the use and sharing of the information provided by informing the County Secretary in writing.

If now or at any time in the future you decide you do not wish to receive information from us then please inform the County Secretary by email or letter. Withdrawal of consent will be acted upon within 3 months.

## 5. Security

We strive to protect the privacy and security of our records and to maintain the reliability and accuracy of personal information.

We will hold information collected by us on Officers computers and in other forms. This data is also backed up, periodically, to a secure cloud based storage solution. Although we cannot guarantee the security of all transmissions of personal information, especially where the internet is involved, we take all reasonable steps to ensure the security of all transmissions. We will send all emails to multiple recipients using the <BCC> option unless agreed otherwise. You accept the inherent security implications of providing information and will not hold us responsible for any breach of security or disclosure of information unless we have been proved to be negligent.

## 6. Photographs

We may take photographs of you attending matches or other events and we may wish to use them for publishing on our website or for publishing in printed media. We will only include details of names of any person in an image on our website or in printed publications for a good reason (for example we may include the full name of a Competition prize winner and the Competition in question).

## 7. Website

The Norfolk County Indoor Bowling Association website address is [www.nciba.org.uk](http://www.nciba.org.uk).

## 8. Information Access and Corrections

You need to inform the County Secretary of any changes to your personal information and you have the right of access under the General Data Protection Regulations to the information we hold about you on our records.

## 9. Policy changes

## Norfolk County Indoor Bowling Association

This policy may change from time to time. If we make any major changes, we will publicise this via the website and may also inform you by either email or by letter.

The table below describes the main purposes for which we process your personal information, the categories of your information involved and our justification for being able to do this.

Purpose	Personal information used	Justification
<b>NCIBA – Affiliated Clubs</b>		
<b>To ensure effective communications between County Executive and affiliated Clubs</b>	Contact details for key Officers	We have a legitimate interest in order to effectively manage Indoor Bowls within Norfolk
<b>County Competitions and leagues</b>		
<b>To administer County Competitions and leagues</b>	<i>As part of all county league results</i>  Name, club, game(s) played and results. This may be used in information published to our website or printed media.	We have a legitimate interest in order to effectively manage and promote the County Leagues.  Where appropriate, "Parental Consent" will be obtained.
	<i>At the Early Stages of Competitions:</i>  Name, Club, telephone number, email address, title, date of birth	We have a legitimate interest in order to effectively manage the County Competitions.  Where appropriate, "Parental Consent" will be obtained.

## Norfolk County Indoor Bowling Association

Purpose	Personal information used	Justification
	<p><i>At the Final Stages of Competitions:</i></p> <p>Names of All Team members and Club name</p> <p>Winners and Runners-Up of Finals - Personal Images</p>	<p>We have a legitimate interest in order to effectively manage the County Competitions.</p> <p>Consent is obtained for the publication of Personal data on NCIBA Website, and published on behalf of the county to any local Facebook groups.</p> <p>Where appropriate, "Parental Consent" will be obtained.</p>
<p><b>County Matches</b> – <i>This relates to all representative games (e.g. Liberty Trophy), Inter County Friendlies and Presidents Invitation games.</i></p>		
<p><b>To administer the Matches</b></p>	<p>Contact details for Players selected for the events</p>	<p>We have a legitimate interest in order to effectively manage the relevant event.</p> <p>Where appropriate, "Parental Consent" will be obtained</p>
<p><b>To maintain player records and a county archive</b></p>	<p>Details of games played and awards (e.g. badges, flashes) made and on what date</p>	<p>We have a legitimate interest in order to effectively manage the relevant event and maintain county records</p> <p>Where appropriate, "Parental Consent" will be obtained</p>

## Norfolk County Indoor Bowling Association

Purpose	Personal information used	Justification
<b>All Persons</b>		
<b>To answer your queries or complaints</b>	Contact details and records of your interactions with us	We have a legitimate interest to provide an information service or complaint handling service to you.
<b>Retention of records</b>	All the personal information we collect	We have a legitimate interest in retaining records whilst they may be required in relation to complaints or claims. We need to retain records in order to properly administer and manage your membership and in some cases, we may have legal or regulatory obligations to retain records.
<b>The security of our IT systems</b>	Your usage of our IT systems and online portals.	We have a legitimate interest to ensure that our IT systems are secure.
<b>For the purposes of promoting the sport, our events.</b>	Images in video and/or photographic form.	Where you have given us your explicit consent to do so
<b>To comply with health and safety requirements</b>	Records of attendance	We have a legal obligation and a legitimate interest to provide you and other members of our organisation with a safe environment in which to participate in sport.

## Norfolk County Indoor Bowling Association

Purpose	Personal information used	Justification
<b>To gather evidence for possible grievance or disciplinary hearings</b>	All the personal information we collect including any disciplinary and grievance information.	We have a legitimate interest in doing so to provide a safe and fair environment for all members and to ensure the effective management of any disciplinary hearings, appeals and adjudications.