

Knightsote Model Boat Club

Data Protection Policy



General Statement of Knightsote Model Boat Club's Duties and Scope

Knightsote Model Boat Club is registered with the Information Commissioner's Office under the Data Protection Act as a Data Controller, (Registration Number: ZA258617), with the Secretary as the named responsible officer.

The Club is required to process relevant personal data regarding its members as part of its operation and shall take all reasonable steps to do so in accordance with this Policy, and the General Data Protection Regulations.

1. Definitions

- 1.1. The Club is Knightsote Model Boat Club
- 1.2. The Data Controller is the person that must exercise control over the processing of Data and carry data protection responsibility for it.
- 1.3. The Data Processor processes data on behalf of the Data Controller.
- 1.4. A Data Subject is a Club Member whose personal data is held by the Club.
- 1.5. Parental consent, includes the consent of a guardian.

2. The Principles

- The Club shall so far as is reasonably practicable comply with the Data Protection Principles contained in the Data Protection Act and the General Data Protection Regulations to ensure all data is:-
 - Fairly and lawfully processed
 - Processed for a lawful purpose
 - Adequate, relevant and not excessive
 - Accurate and up to date
 - Not kept for longer than necessary
 - Processed in accordance with the data subject's rights
 - Secure

3. Personal Data

- 3.1. Personal data covers both facts and opinions about an individual where that data identifies an individual. Personal data may also include sensitive personal data as defined in the Act.
- 3.2. For the Club this data is the Member's Name, Address, Date of Birth, Telephone Number and Email Address. This data is low sensitivity data and may be readily available in the public domain, but shall still be managed in accordance with the Acts and Regulations.
- 3.3. Photographs of Club Events may be considered personal data where an individual is clearly identifiable.

4. Sensitive Personal Data

- 4.1. The Club does not hold any sensitive personal data on any of its members, as defined in the Acts.

5. Processing of Personal Data

- 5.1. The Club has identified the Club Secretary as the Data Controller.
- 5.2. The Club Treasurer is a Data Processors as defined within the Acts.

- 5.3. Some Committee Members are Data Processors as defined within the Acts, depending upon their specific roles within the Club.
- 5.4. In general Consent is required as the lawful basis for the processing of personal data, and all Club members shall supply their data using the Club's Data Collection and Data Privacy Notice form, which shall be signed to confirm consent.
- 5.5. Photographs, taken at Club Events and held by the Club, may be used only in accordance with the Regulations. They may at times be used in accordance with 'Legitimate Interests' as the lawful basis for processing/using them, without seeking individual consent. Such use shall not include images of children, where parental/guardian consent shall be required, unless the child is in the background or in a crowd photograph where identification is not immediately possible.
- 5.6. Photographs used shall not be known to be defamatory or show individuals in bad light.
- 5.7. Under 18s shall supply their data using the Club's Data Collection and Data Privacy Notice form and shall obtain parental/guardian consent for its use by the Club.

6. Responsibilities and Duties

- 6.1. The Data Controller (DC) shall ensure that the Club has appropriate Policies, Procedures and Record Keeping systems to protect and keep the Members personal data secure in accordance with the Acts. The Data Controller shall also act as a contact point for members who wish to access their data, or have it removed from the Club's systems. The Data Controller will ensure that the Data Processors are aware of their responsibilities under this policy, and that the data they hold is kept secure and deleted as and when required by the Club.
- 6.2. The Data Processors shall process the data for the administration of the Club, in a secure manner. This will include for Insurance, administrative and communication needs. The data must not be made available to third parties or other organisations, or to other Club members, where a member has specifically stated that they do not want their data shared with other Club members. Should a member leave the Club, or request their data be removed from the Club's records, then the Data Controller shall advise the Data Processors, who shall update their records. Old data and records shall be deleted from any computer storage, and any hard copies shall be destroyed.
- 6.3. Members shall ensure that their data is kept up to date and any changes notified to the Data Controller. If at any time they wish to have their data removed from the Club's records, they shall contact the Data Controller.

7. Rights of Access to Information

- 7.1. Members have the right of access to information held by the Club, subject to the provisions of the Data Protection Act 1998, the Freedom of Information Act 2000 and the General Data Protection Regulations. Any member wishing to access their personal data should put their request in writing to the Data Controller.

8. Right to Erasure

- 8.1. Members have the right to have their personal data erased if:
 - 8.1.1. Their personal data is no longer necessary for the purpose which the Club originally collected or processed it for. For Example they leave the Club.
 - 8.1.2. The Club is relying on consent as the lawful basis for holding/processing the data, and the member withdraws their consent.

8.1.3. The Club is relying on legitimate interests as the lawful basis for processing and the member objects to the processing of that data, and there is no overriding legitimate interest to continue this processing.

8.1.4. The member shall preferably contact the Club Secretary (as Data Controller) to request the erasure of the personal data, although any Committee Member can be contacted if necessary. Where a Committee Member receives a request they have a legal responsibility to pass that request onto the Club Secretary for it to be actioned.

8.1.5. A request for erasure shall be responded to in accordance with the timescales in the Regulations, Where that data relates to children it shall be erased as soon as possible.

8.1.6. A request for erasure can only be refused in accordance with legitimate reasons as defined in the Regulations.

9. Enforcement

9.1. If a member believes that the Club has not complied with this Policy or acted otherwise than in accordance with the General Data Protection Regulations, the member should notify the Club's Chairman and the Club Secretary (as Data Controller). They may also contact The Information Commissioner's Office to notify them of the need for enforcement if they believe that is necessary.

10. Data Security

10.1. The Club will take appropriate technical and organisational steps to ensure the security of personal data. All members will be made aware of this policy and their duties under the Act. The Club and all members are required to respect the personal data and privacy of others and must ensure that appropriate measures are taken against unlawful or unauthorised processing/accessing of personal data, and against the accidental loss of or damage to all personal data.

11. CCTV

11.1. The Club owns and operates a CCTV system for the purposes of crime prevention, detection and safety. Where a member can be identified, images must be processed as personal data as for photographs above.. The CCTV system shall be operated in accordance with KMBC's CCTV policy.