



Winchester RFC Privacy Policy

NOTES TO USERS:

WINCHESTER RFC PRIVACY NOTICE

What does this policy cover?

This policy describes how Winchester RFC (also referred to as “the Club”, “we” or “us”) will make use of the data we handle in relation to our members and players, including our use of the Game Management System (“GMS”) provided by the Rugby Football Union (“RFU”). The policy also describes the RFU’s use of data on GMS.

It also describes your data protection rights, including a right to object to some of the processing which we carry out. More information about your rights, and how to exercise them, is set out in the “What rights do I have?” section.

We do our best to keep the information you disclose to us secure. We ask you to do the same – never disclose passwords or bank account details to others and observe safe online practices at all times.

We are committed to:

- Ensuring that we comply with the eight data protection principles, as listed below
- Meeting our legal obligations as laid down by the Data Protection Act 1998 and by the GDPR May 2018
- Ensuring that data is collected and used fairly and lawfully
- Processing personal data only in order to meet our operational needs or fulfil legal requirements
- Taking steps to ensure that personal data is up to date and accurate
- Establishing appropriate retention periods for personal data
- Ensuring that data subjects' rights can be appropriately exercised
- Providing adequate security measures to protect personal data
- Ensuring that a nominated officer is responsible for data protection compliance and provides a point of contact for all data protection issues
- Ensuring that all club officers are made aware of good practice in data protection
- Providing adequate training for all staff responsible for personal data
- Ensuring that everyone handling personal data knows where to find further guidance
- Ensuring that queries about data protection, internal and external to the organisation, are dealt with effectively and promptly
- Regularly reviewing data protection procedures and guidelines within the club

Data protection principles

- 1. Personal data shall be processed fairly and lawfully*
- 2. Personal data shall be obtained for one or more specified and lawful purposes, and shall not be further processed in any manner incompatible with that purpose or those purposes*
- 3. Personal data shall be adequate, relevant and not excessive in relation to the purpose or purposes for which they are processed*
- 4. Personal data shall be accurate and, where necessary, kept up to date*
- 5. Personal data processed for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes*

6. Personal data shall be processed in accordance with the rights of data subjects under the Data Protection Act 1998

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

8. Personal data shall not be transferred to a country or territory outside the European Economic Area unless that country or territory ensures an adequate level of protection for the rights and freedoms of data subjects in relation to the processing of personal data

Summary of how we and the RFU use your data

Winchester RFC uses your personal data to manage and administer your membership and your involvement with its teams and club, and to keep in contact with you for these purposes.

Winchester RFC uses your personal data to manage and administer your membership and your involvement with its teams and club, and to keep in contact with you for these purposes. We also keep data of those who have asked to be on our database for the purposes of keeping you in touch with events at the club which may be of interest to members and non-members alike. Some data is shared with the RFU, who use your data to regulate, develop and manage the game.

The RFU's Use of your Data

The RFU may share data with other regulatory bodies, such as the Disclosure and Barring Service (in order to undertake a DBS check, the result of which will be input into the RFU's database, the Game Management System GMS) or the IRB, WADA, UK Sport and other organisations or individuals involved in the administration of the doping control process or concerned with the results of that process.

Where we or the RFU rely on your consent, such as any consent we seek for email marketing, photographic consent or consent to share player medical details with First Aiders or Team Managers, you can withdraw this consent at any time.

Amongst the data we collect from you may be medical (including injury) information. We will hold this where you (or your parent, if you are under the age of 18) have given consent, so that we can ensure we are aware of your condition and can that you are supported appropriately.

We may receive information relating to your existing registrations with other clubs or rugby bodies or disciplinary history from the RFU through GMS. Additionally, for certain role holders or those working with children, we may receive information from the Disclosure and Barring Service and RFU on the status of any DBS check you have been required to take.

Some data is shared with the RFU, who use your data to regulate, develop and manage the game.

Where we or the RFU rely on your consent, such as any consent we seek for email marketing, you can withdraw this consent at any time.

Members and Parents Data:

We collect information from you about yourselves and/or your child(ren) and may receive information about you/them from their previous club, such as when a Player Transfer request occurs.

The information we collect and process

When you join and when we carry out annual renewals of your membership includes your name, gender, date of birth, contact details (postal address, mobile phone and email address), any special needs and relevant medical or disability information you consent to give to us (to ensure we are aware of any support we may need to provide to you) and for players under the age of 18 it also includes school attended, plus parents' contact details.

Via a secure link and our preferred partners, our membership payment system also includes confirmation of any payments made by you for membership fees, and may include banking details if you have set up payments or direct debits. We may also use images of adults and/or children at the club for activities as match analysis, celebratory achievements and/or marketing, for which we seek consent.

Once you are signed onto our database, we further record a unique personal identification number (your "RFU ID") against which we record your type of membership, involvement in any teams, or any key role you may have been allocated, (such as Chair, Safeguarding Lead, Membership Secretary, Team Manager, Coach) and details of any courses or training you have undertaken in regard to that role. Some information will be generated as part of your involvement with us, in particular data about your performance, involvement in particular matches in match reports and details of any disciplinary issues or incidents you may be involved in on and off the pitch, such as within health and safety records.

When you visit our website, or log into GMS (the RFU's Game Management System) to manage your details, or buy a membership, information about your online browsing behaviour and any devices you have used to access our Site (including your IP address, browser type and mobile device identifiers) may be collected.

We use your email address to send you your password to enable you to log in to our GMS database, to communicate about club activities (that you as a member have elected to receive).

We also record your marketing preferences, which you choose and can change yourself at any time, by amending your record yourself on Pitchero and/or the GMS or by contacting the Data Officer on administration@Winchesterrfc.com

Club Staff and Volunteers:

As the Data Controller, we also process personal data relating to those we employ to work at, or otherwise engage to work at, our club, in both a paid or voluntary capacity. This is for employment purposes, to assist in the running of the club and/or to enable individuals to be paid.

This personal data includes identifiers such as name, gender, date of birth, contact details and, where we have to check your eligibility or ability to work for us, your National Insurance number and/or passport details. We may also require characteristics such as ethnic group, employment contracts, remuneration details and qualifications. We use images of staff (paid and voluntary) to provide photo ID lanyards to wear around the club for which we seek consent.

NB: Staff, Volunteers and Committee are reminded to ensure mass emails are on a BCC basis

Private Room Hire or Events Information

For the purpose of administering a legitimate business and offering a better service to our customers who take advantage of our Events or Room hire; Winchester RFC may collect

information for the sole purpose of the rental, and supply of event services by Winchester RFC. We shall ask for consent and shall not share this data to any other party without your consent.

What information do we collect?

We collect and process personal data from you or your parent when you join and when we carry out annual renewals of your membership. This includes:

- your name
- your gender,
- your date of birth,
- your RFU ID (as assigned in GMS)
- your home address, email address and phone number;
- your passport and NI details, where we have to check your eligibility or ability to work for us;
- your type of membership and involvement in particular teams, or any key role you may have been allocated, such as Chair, Safeguarding Lead, Membership Secretary etc.;
- your payment and/or bank account details, where you provide these to pay for membership;
- your marketing preferences, including any consents you have given us;
- your medical conditions or disability, where you provide this to us with your consent (or your parent's consent) to ensure we are aware of any support we may need to provide to you.

Some information will be generated as part of your involvement with us, in particular data about your performance, involvement in particular matches in match reports and details of any disciplinary issues or incidents you may be involved in on and off the pitch, such as within health and safety records.

What information do we receive from third parties?

Sometimes, we receive and share information about you from third parties. For example, if you are a child, we may be given information about you by your parents..

We may receive information relating to your existing registrations with other clubs or rugby bodies or disciplinary history from the RFU through GMS. Additionally, for certain role holders or those working with children, we may receive information from the Disclosure and Barring Service and RFU on the status of any DBS check you have been required to take.

How do we use this information, and what is the legal basis for this use?

We process this personal data for the following purposes:

- To fulfil a contract, or take steps linked to a contract: this is relevant where you make a payment for your membership and any merchandise, or enter a competition. This includes:
 - taking payments;

- communicating with you;
- providing and arranging the delivery or other provision of products, prizes or services;
- As required by the Club to conduct our business and pursue our legitimate interests, in particular:
 - we will use your information to manage and administer your membership and your involvement with its teams and club, and to keep in contact with you for these purposes;
 - we will also use data to maintain records of our performances and history, including match reports, score lines and team sheets;
 - [we use CCTV cameras to maintain the security of our premises, and may use this video to investigate incidents at the Club or its premises]
 - we use data of some individuals to invite them to take part in market research related to the club activities only;
 - Communicating with you; Your email address/telephone contact is used extensively by the club to send you details of Club events, news and other offers which may be of interest to you. These are sent by a regular communication called “In Touch” which you may unsubscribe to at any time by letting us know. This is usually weekly but on occasion we may send a special edition when we have something really important to share with you and it doesn't happen very often. Your email and emergency contacts are also used by Club administrators, Team Managers and coaches to contact players (or the parents of players under the age of 18) to send details of rugby training or matches, follow up player welfare or discipline issues.
 - We may also use your postal address, email address or phone number to contact you in response to the communications that you have directed at us, invite you to take part in events at the club, ask you for your opinions/feedback, award you a prize if you have won a competition we're running, send you items you have ordered such as International Tickets or shop items to support providing and arranging the delivery or other provision of products, prizes or services

Where you give us consent:

- we will send you direct marketing or promotional material by email;
- we may handle medical or disability information you or your parent provides to us, to ensure we support you appropriately;
- on other occasions where we ask you for consent, we will use the data for the purpose which we explain at that time.

For purposes which are required by law:

- we maintain records such as health and safety records and accounting records in order to meet specific legal requirements;
- we ensure, where you will work with children, that you have undergone an appropriate DBS check – this is also carried out with your consent.

- where you hold a role at the Club requiring us to check your right to work, we may process information to meet our statutory duties;
- we may respond to requests by government or law enforcement authorities conducting an investigation.
- We may, from time to time, allow photographs to be taken in accordance with our Photographic Policy in our safeguarding section and we seek your consent via our membership forms to do this.

Data from CCTV

At our club, we also operate CCTV to provide a safer, more secure environment for members, players, staff and volunteers and to deter and prevent anti-social behaviour, vandalism and theft. Our CCTV cameras record visual images only and do not record sound. CCTV equipment is in use at all times around the club and there are signs to indicate this.

Images are recorded in a way that allows specific times and dates to be identified, are stored securely, and are deleted after a retention period (currently 30 days). Recorded images can only be viewed in a restricted area by approved staff and would be viewed only when there is suspected criminal activity or anti-social behaviour. The club ensures that images are not retained for longer than is necessary - once the retention period has expired, the images are removed or erased.

How does the club and RFU use any of my information?

Legacy Data provides a online Membership Information system

- your name;
- your gender;
- your date of birth;
- your Pitchero ID (as assigned in GMS);
- your home address, email address and phone number; and
- your type of membership and involvement in particular teams at the Club, or any key role you may have been allocated, such as Chair, Safeguarding Lead, Membership Secretary etc.
- Relevant Medical Conditions

We shall be instructing Pitchero on the need to remove legacy data in 2019 after RFU GMS confirmation of full transfer to GMS.

The RFU provides GMS, but make its own use of the following information:

- your name;
- your gender;
- your date of birth;
- your RFU ID (as assigned in GMS);

- your home address, email address and phone number;
- your type of membership and involvement in particular teams at the Club, or any key role you may have been allocated, such as Chair, Safeguarding Lead, Membership Secretary etc.

The RFU uses this information as follows:

- As required by the RFU to conduct its business and pursue its legitimate interests, in particular:
 - communicating with you or about you where necessary to administer Rugby in England, including responding to any questions you send to the RFU about GMS;
 - administering and ensuring the eligibility of players, match officials and others involved in English rugby – this may involve the receipt of limited amounts of sensitive data in relation to disabled players, where they are registered for a disabled league or team, or in relation to anti-doping matters;
 - maintaining records of the game as played in England, in particular maintaining details of discipline and misconduct;
 - monitoring use of GMS, and using this to help it monitor, improve and protect its content and services and investigate any complaints received from you or from others about GMS;
 - maintaining statistics and conducting analysis on the make-up of rugby's participants;
 - ensuring compliance with the current RFU Rules and Regulations including those on the affiliation of clubs, referee societies, constituent bodies and other rugby bodies, and registration of players; and
 - communicating with you to ask for your opinion on RFU initiatives.

For purposes which are required by law:

- The RFU will ensure, where you will work with children and where this is required, that you have undergone an appropriate DBS check – this is also carried out with your consent.
- The RFU may respond to requests by government or law enforcement authorities conducting an investigation.
- We maintain records such as health and safety records and accounting records in order to meet specific legal requirements
- where you hold a role at the Club requiring us to check your right to work, we may process information to meet our statutory duties we may respond to requests by government or law enforcement authorities conducting
- We maintain records such as health and safety records and accounting records in order to meet specific legal requirements
- where you hold a role at the Club requiring us to check your right to work, we may process information to meet our statutory duties
- we may respond to requests by government or law enforcement authorities conducting

Withdrawing consent or otherwise objecting to direct marketing

Wherever we rely on your consent, you will always be able to withdraw that consent, although we may have other legal grounds for processing your data for other purposes, such as those set out above. In some cases, we are able to send you direct marketing without your consent, where we rely on our legitimate interests. You have an absolute right to opt-out of direct marketing, or profiling we carry out for direct marketing, at any time. You can do this by following the instructions in the communication where this is an electronic message, or by contacting us using the details set out below in the “**How do I get in touch with you or the RFU?**” section.

Who will we share this data with, where and when?

In addition to sharing data with the RFU, we will share your data with: Pitchero, (ANY OTHER?) for purpose of maintaining a web presence including match, event information and reports and supporting photos for the purpose of promoting the club, club membership and membership activities. This will be migrated in 2018 to RFU's GMS system

Some limited information may be shared with other stakeholders in rugby, such as other clubs, Constituent Bodies, referee societies, league organisers, so that they can maintain appropriate records and assist us in organising matches and administering the game.

Personal data may be shared with government authorities and/or law enforcement officials if required for the purposes above, if mandated by law or if required for the legal protection of our or the RFU's legitimate interests in compliance with applicable laws.

Personal data will also be shared with third party service providers, who will process it on our behalf for the purposes identified above. Such third parties include the RFU as the provider of GMS and providers of pitchhero

Keeping information about you secure is very important to us so we store and process your personal information in accordance with the high standards required under data protection legislation. From time to time and for operational reasons the personal information we collect from you may be transferred to and stored in countries outside of the European Economic Area (“**EEA**”).

Where information is transferred outside the EEA, and where this is to a stakeholder or vendor in a country that is not subject to an adequacy decision by the EU Commission, we take care to ensure that they have appropriate security measures in place. And that data is adequately protected by EU Commission approved standard contractual clauses, an appropriate Privacy Shield certification or a vendor's Processor Binding Corporate Rules. A copy of the relevant mechanism can be provided for your review on request to the RFU or the club.

What rights do I have?

You have the right to **ask us for a copy** of your personal data; to **correct, delete** or **restrict** (stop any active) processing of your personal data; and to **obtain the personal data you provide to us for a contract or with your consent in a structured, machine readable format** from both RFU, RFU GMS and Pitchero

In addition, you can **object to the processing** of your personal data in some circumstances (in particular, where we don't have to process the data to meet a contractual or other legal requirement, or where we are using the data for direct marketing).

These **rights may be limited**, for example if fulfilling your request would reveal personal data about another person, or if you ask us to delete information which we are required by law to keep or have compelling legitimate interests in keeping.

You have the same rights for data held by the RFU for its own purposes on GMS.

To exercise any of these rights, you can get in touch with us – or, as appropriate, the RFU or its data protection officer – using the details set out below. If you have unresolved concerns, you have the **right to complain** to the club via our complaints procedure or to the Information Commissioner's Office.

Much of the information listed above must be provided on a mandatory basis so that we can make the appropriate legal checks and register you as required by RFU Rules and Regulations. We will inform you which information is mandatory when it is collected. Some information is optional, particularly information such as your medical information. If this is not provided, we may not be able to provide you with appropriate assistance, services or support.

How do I get in touch with you or the RFU?

We hope that we can satisfy queries you may have about the way we process your data. If you have any concerns about how we process your data, or would like to opt out of direct marketing by the club (for the purpose of running the club) you have consented to already, you can get in touch at [email address] or by writing to [physical address]

If you have any concerns about how the RFU process your data, you can get in touch at legal@rfu.com or by writing to The Data Protection Officer, Rugby Football Union, Twickenham Stadium, 200 Whitton Road, Twickenham TW2 7BA.

How long will you retain my data?

We process the majority of your data for as long as you are an active member and for 3 years after this.

Where we process personal data for marketing purposes or with your consent, we process the data for **3** unless you ask us to stop, when we will only process the data for a short period after this (to allow us to implement your requests). We also keep a record of the fact that you have asked us not to send you direct marketing or to process your data indefinitely so that we can respect your request in future.

Where we process personal data in connection with performing a contract or for a competition, we keep the data for **6 years from your last interaction with us**.

We will retain information held to maintain statutory records in line with appropriate statutory requirements or guidance.

The RFU will maintain records of individuals who have registered on GMS, records of DBS checks and the resulting outcomes and other disciplinary matters for such period as is set out in the RFU's privacy notice to be set out on www.englandrugby.com.

Records of your involvement in a particular match, on team sheets, on results pages or in match reports may be held indefinitely both by us and the RFU in order to maintain a record of the game.

To exercise any of these rights, you can get in touch with us– or, as appropriate, the club, the RFU or its data protection officer – using the details set out below. If you have unresolved concerns, you have the right to complain to the Information Commissioner’s Office.

Much of the information listed above must be provided on a mandatory basis so that we can make the appropriate legal checks and register you as required by RFU Rules and Regulations. We will inform you which information is mandatory when it is collected. Some information is optional, particularly 8

information such as your medical information. If this is not provided, we may not be able to provide you with appropriate assistance, services or support.

More Information:

We hope that we can satisfy queries you may have about the way we process your data. If you have any concerns about how we process your data, you can get in touch at or by writing to

Email

secretary@winchesterrugby.com

Address

Winchester RFC Ltd
North Walls Park (Off Nuns Road)
Winchester
UNITED KINGDOM
HAMPSHIRE
SO23 7EF

If you have any concerns about how the RFU process your data, you can get in touch at legal@rfu.com or by writing to The Data Protection Officer, Rugby Football Union, Twickenham Stadium, 200 Whitton Road, Twickenham TW2 7BA.

For more information about the Game Management System:

<http://www.englandrugby.com/governance/club-support/gms/about/>

For more information about England Rugby Data Protection Policy:

<http://www.englandrugby.com/about-the-rfu/data-protection/>

For more information about the RFU’s privacy notice:

<http://www.englandrugby.com/about-the-rfu/privacy-policy/>

Information Commissioners Office (ICO) website www.ico.org.uk

This policy is effective from 27 March 2018 and replaces with immediate effect any previous versions.