

# WEST END BOWLS CLUB - PRIVACY STATEMENT

West End Bowls Club (WEBC) is committed to respecting the privacy of its members. This notice explains how the club might use personal information collected before, during and after your membership. It explains how the club complies with the law on data protection, and what your rights are.

WEBC has not appointed a Data Protection Officer to oversee its compliance with data protection as it is not required to do so.

## 1. PERSONAL INFORMATION WE MAY COLLECT FROM YOU

Depending on the type of membership you register for with us, you may initially provide us with or we may obtain personal information about you, such as information regarding your:

- Personal contact details that allows the club to contact you directly e.g. name, title, email addresses and telephone numbers.
- Date of birth.
- Gender.
- Membership start and end date.
- References and other information included in a CV or cover letter or as part of the application process for membership.
- Records of your interactions with WEBC e.g. telephone conversations, emails, other correspondence and instructions.
- Any payment details you provide and details of the financial transactions with you.
- Use of and movements through our online portal, passwords, personal identification numbers, IP addresses, user names and other IT system identifying information.
- Records of your attendance at any events arranged by us.
- CCTV footage and other information obtained through electronic means e.g. swipe card and key fob records.
- Images in video and/or photographic form and voice recordings.
- Your contact and marketing preferences.
- Identification documents such as passport and identity cards.
- Details of membership of other relevant organisations e.g. County, District and League Membership.
- Details of next of kin, family members, coaches and emergency contacts;
- Records and assessment of any player rankings, grading or ratings, competition results, details regarding events attended and performance.
- Disciplinary and grievance information

## 2. SPECIAL CATEGORIES OF PERSONAL INFORMATION

We may also collect, store and use the following “**special categories**” of more sensitive personal information regarding you:

- Information about your race or ethnicity, religious beliefs and sexual orientation.
- Information about your health, including any medical condition, health and sickness records, medical records and health professional information.
- Biometric information about you e.g. fingerprints, retina scans.

**We will not collect the above** special category personal information unless one of the following applies;

- The processing is necessary for reasons of substantial public interest, on a lawful basis.
- It is necessary for the establishment, exercise or defence of legal claims.
- it is necessary for the purposes of carrying out the obligations and exercising our or your rights in the field of employment and social security and social protection law.
- It is based on your explicit consent.

In the table below we refer to these as the “special category reasons for processing your personal data”.

We may also collect criminal records information about you. This would be on the basis of legal obligations or based on your explicit consent.

### 3. WHERE WE COLLECT YOUR INFORMATION

WEBC typically collects personal information about potential members when they apply to join the club or register an interest through social media (www.westendbowls.com, webcmembership@gmail.com or the club’s Facebook page). Similarly, personal information may be collected about people when they purchase any services or products from us, when they make a query and/or complaint or when they correspond with WEBC by phone, e-mail or in some other way.

WEBC may also collect personal information about potential members from any third party references provided as part of the application process for joining the club.

Anyone who provides WEBC with details of third parties, e.g. referees, next of kin, beneficiaries, family members and emergency contacts should share this privacy notice with those of them who they feel are sufficiently mature to understand it. Third parties have the same rights, which are set out in the “**Your rights in relation to personal information**” section below.

### 4. USES MADE OF THE INFORMATION

The table below describes the main purposes for which WEBC may process your personal information, the categories of information involved and the lawful basis for doing this.

Purpose	Personal information used	Lawful basis
To administer your membership of WEBC and to manage the relationship including dealing with payments and any support, service or product enquiries made by you.	All contact and membership details, transaction and payment information, records of your interactions with us, and marketing preferences.	This is necessary to enable WEBC to properly manage and administer your membership contract with us.
To arrange and manage any contracts for the provision of any services or products	Contact details, transaction and payment information. Records of your interactions with us.	This is necessary to enable WEBC to properly administer and perform any contract for the provision of any services and products you have purchased from it.
To send you information which is included within your membership. e.g. details of events, changes to policies and rules, and partner offers.	Contact and membership details.	This is necessary to enable WEBC to properly manage and administer your membership.
To send you other marketing information which you might find useful or which you have requested e.g. newsletters, membership information, events and, products.	Contact details and Communication preferences.	For example WEBC’s sponsors may, from time to time, offer discounts to Club members.
To answer your queries or complaints	Contact details and records of your interactions with WEBC	WEBC has a legitimate interest to provide complaint handling services to you in the event of any issue affecting your membership.
Retention of records	All the personal information collected by WEBC.	WEBC has a legitimate interest in retaining records which may be required in relation to complaints or claims. The Club needs to keep records in order to properly administer and manage its members and,

		in some cases, may have legal or regulatory obligations to do so.
The security of our IT systems	Your usage of our IT systems and online portals.	WEBC has a legitimate interest to ensure that our IT systems are secure.
To conduct data analytics studies to better understand event attendance and trends within the sport	Records of attendance at any events or competitions arranged by us.	WEBC has a legitimate interest in doing this so as to ensure that its membership is remains targeted and relevant.
To promote the club, its events and its membership packages.	Images in video and/or photographic form.	Where you have given us your explicit consent to do so (as happens when you sign your membership application).
To comply with health and safety requirements	Records of attendance, CCTV footage and other information obtained through electronic means such as swipe card and key fob records, medical information, Biometric information.	WEBC has a legal obligation and a legitimate interest to provide a safe environment in which sport may take place.
To administer attendance at any courses or programmes you undertake.	All contact and membership details, transaction and payment data. Details of other relevant bowling organisation membership and performance data.	This is necessary to enable WEBC to register you on relevant programmes and properly manage and administer your attendance.
To arrange for any trip or transportation to and from an event	Identification documents details of next of kin, family members and emergency contacts, transaction and payment information, health and medical information.	This is sometimes necessary to enable WEBC to make the necessary arrangements for the trip and/or transportation to an event  <b>Note: Members are asked to carry their own medical and next of kin information (Ref: Code of Conduct).</b>
To use information about members' physical or mental health (including any injuries) or disability status to assess their fitness to participate in events or activities, to safeguard their health and safety and to provide appropriate adjustments to the facilities.	Health and medical information.	<b>Note: Members are asked to carry their own medical information and to take responsibility for advising the person in charge of the activity or any particular concern or risk they are aware of. (Ref: Code of Conduct)</b>
To gather evidence for possible grievance or disciplinary hearings	All the personal information collected	
To monitor the WEBC Equality Policy	Name, title, date of birth, gender, information about race or ethnicity, disability and health and medical information.	WEBC has a legitimate interest in promoting a sporting environment that is inclusive, fair and accessible.
To comply with legal obligations regarding the Safeguarding of	Information about members' criminal convictions and offences.	WEBC accesses Criminal Record Information only on the basis of legal

Children, Young People and Vulnerable Adults.		obligation or the explicit consent of the member concerned.
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5. Members have a legal, contractual or other requirement or obligation to provide WEBC with some personal information. If a member refuses to provide the personal information requested the club may not be able to admit her/him as a member or may have to terminate the membership. Other personal information (e.g. details of medical information and next of kin) may not be considered critical by WEBC and members may opt out from providing it. In such circumstances the member must be aware, and accept, that this could prevent the club from ensuring a safe and healthy environment.

Where a member has given the club consent to use her/his personal information in a particular manner, s/he has the right to withdraw this consent at any time.

Please note however that withdrawal of consent will not affect any use of the data made before consent was withdrawn. WEBC may still be entitled to hold and process the relevant personal information to the extent that it is entitled to do so on bases other than the member's consent. Withdrawal of consent may also have the same effect as not providing the information in the first place, e.g. the club we may no longer be able to provide some member benefits.

## 6. TRANSFERRING YOUR PERSONAL INFORMATION INTERNATIONALLY

The personal information WEBC collects is not transferred to and stored in countries outside of the UK and the European Union.

## 7. HOW LONG DO WE KEEP PERSONAL INFORMATION FOR?

The length of time WEBC retains members' personal information depends on the type of information and the reason why it was collected. In some cases personal information may be retained on a long-term basis: e.g. information retained for legal purposes will normally be retained in accordance with usual commercial practice and regulatory requirements. Generally, where there is no legal requirement WEBC may retain all physical and electronic records for a period of 6 years after the member's last contact with the club or the end of her/his membership.

The exceptions to include;

CCTV records which are held for no more than 30 days unless there is a need to retain them for the purpose of prevention and detection of crime;

Details of unsuccessful membership applicants, which are held for up to two years.

Information that may be relevant to personal injury or discrimination claims. These may be retained until the limitation period for those types of claims has expired. For personal injury or discrimination claims this can be an extended period.

It is important to ensure that the personal information held is accurate and up-to-date, and members should advise the club of changes.

## 8. YOUR RIGHTS IN RELATION TO PERSONAL INFORMATION

You have the following rights in relation to your personal information:

- The right to be informed about how your personal information is being used
- The right to access the personal information held about you
- The right to request the correction of inaccurate personal information held about you
- The right to request the erasure of your personal information in certain limited circumstances
- The right to restrict processing of your personal information where certain requirements are met
- The right to object to the processing of your personal information
- The right to request that elements of your data are transferred either to you or another service provider
- The right to object to certain automated decision-making processes using your personal information

You should note that some of these rights, for example, the right to require the transfer of your data to another service provider or the right to object to automated decision making, may not apply as they have specific requirements and exemptions which may not apply to personal information recorded and stored by WEBC

**9.** Whilst this privacy notice sets out a general summary of your legal rights in respect of personal information, this is a very complex area of law. More information about your legal rights can be found on the Information Commissioner's website at <https://ico.org.uk/for-the-public/>.

To exercise any of the above rights, or if you have any questions relating to your rights, please contact the Club Secretary or President by telephone, e-mail or letter.

If you are unhappy with the way WEBC is using your personal information you can also complain to the UK Information Commissioner's Office or your local data protection regulator. They are there to help and will encourage you to contact WEBC to resolve your complaint first.