

ESSEX AND SUFFOLK GLIDING CLUB DATA PROTECTION POLICY

INTRODUCTION

The Essex and Suffolk Gliding Club, the Club, needs to collect and use information about people to whom we supply services and with whom we work on behalf of.

We regard the lawful and correct treatment of personal information as very important to our successful operation and to maintaining confidence between us and those with whom we serve and carry out business.

We will ensure that we treat personal information lawfully and correctly. We endorse and adhere to the Relevant Legislation.

This policy applies to the processing of personal data in manual and electronic records kept by us. It also covers our response to any data breach and other rights under the Relevant Legislation.

This policy applies to all personal data collected from those in the sport who we supply services to, and to our members, officers, staff and contractors. These are referred to in this policy as relevant individuals.

DEFINITIONS

“Relevant Legislation” comprises the UK Data Protection Act (2108) and the principles of the General Data Protection Regulation (GDPR).

“Personal data” is information that relates to an identifiable person who can be directly or indirectly identified from that information, for example, a person’s name, identification number, location, online identifier. It can also include pseudonymised data.

“Special categories of personal data” is data which relates to an individual’s health, sex life, sexual orientation, race, ethnic origin, political opinion, religion, and trade union membership. It also includes genetic and biometric data (where used for ID purposes).

“Criminal offence data” is data which relates to an individual’s criminal convictions and offences.

“Data processing” is any operation or set of operations which is performed on personal data or on sets of personal data, including collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

“Club services” mean any of the certificates, endorsements, ratings, subscriptions and support requested, provided by the Club and available to the relevant individual.

DATA PROTECTION PRINCIPLES

Under Relevant Legislation, all personal data obtained and held by us must be processed according to a set of core principles. In accordance with these principles, we will ensure that:

- a) processing will be fair, lawful and transparent;
- b) data be collected for specific, explicit, and legitimate purposes;
- c) data collected will be adequate, relevant and limited to what is necessary for the purposes of processing;
- d) data will be kept accurate and up to date. Data which is found to be inaccurate will be rectified or erased without undue delay;
- e) data is not kept for longer than is necessary for its given purpose;
- f) data will be processed in a manner that ensures appropriate security of personal data including protection against unauthorised or unlawful processing, accidental loss, destruction or damage by using appropriate technical or organisation measures; and
- g) we will comply with all Relevant Legislation, including but not limited to GDPR procedures, for international transferring of personal data.

DATA HELD

To carry out effective and efficient processes, we keep several categories of personal data. We keep this data on secure servers. The data is processed by trained Club officers, members and staff through password-protected back office software.

When you use one of our services, you may provide us with or we may obtain personal information about you. Please refer to the detail described in our Privacy Notice.

RIGHTS

You have the following rights in relation to the personal data we hold on you:

- a) the right to be informed about the data we hold on you and what we do with it;
- b) the right of access to the data we hold on you. More information on this can be found in the section headed “Access to Data” below and in our separate policy on Subject Access Requests”;
- c) the right for any inaccuracies in the data we hold on you, however they come to light, to be corrected. This is also known as ‘rectification’;
- d) the right to have data deleted in certain circumstances. This is also known as ‘erasure’;
- e) the right to restrict the processing of the data;

- f) the right to transfer the data we hold on you to another party. This is also known as ‘portability’;
- g) the right to object to the inclusion of any information; and
- h) the right to regulate any automated decision-making and profiling of personal data.

RESPONSIBILITIES

To protect the personal data of relevant individuals, those within the Club who must process data as part of their role have been made aware of our policies on data protection.

We have also appointed a member with responsibility for reviewing our data protection systems.

LAWFUL BASIS OF PROCESSING

We acknowledge that processing may be only be carried out where a lawful basis for that processing exists and we have assigned a lawful basis against each processing activity.

Where no other lawful basis applies, we may seek to rely on the relevant individuals’ consent to process data.

However, we recognise the high standard attached to its use. We understand that consent must be freely given, specific, informed and unambiguous. Where consent is to be sought, we will do so on a specific and individual basis where appropriate. Officers, members and staff will be given clear instructions on the desired processing activity, informed of the consequences of their consent and of their clear right to withdraw consent at any time.

ACCESS TO DATA

As stated above, individuals have a right to access the personal data that we hold on them. To exercise this right, relevant individuals should make a Subject Access Request. We will comply with the request without delay, and within one month unless, in accordance with legislation, we decide that an extension is required. Those who make a request will be kept fully informed of any decision to extend the time limit.

No charge will be made for complying with a request unless the request is manifestly unfounded, excessive or repetitive, or unless a request is made for duplicate copies to be provided to parties other than the member making the request. In these circumstances, a reasonable charge will be applied.

Further information on making a subject access request is contained in our Subject Access Request policy.

DATA DISCLOSURES

The Club may disclose data to the following parties when strictly necessary for the purpose and to meet legal and regulatory obligations;

- a) any party approved by the data subject, ie the person who the data applies to;
- b) Club service providers;
- c) the Government or our regulators: where we are required to do so by law, to operate our formal approvals, or to assist with their investigations or initiatives; and
- d) police, law enforcement and security services: to assist with the investigation and prevention of crime and the protection of national security.

DATA SECURITY

All our data processors are aware that hard copy personal information should be kept in a locked filing cabinet, drawer, or safe.

Our data processors are aware of their roles and responsibilities. All are instructed to store files or written information of a confidential nature in a secure manner so that are only accessed by people who have a need and a right to access them and to ensure that screen locks are implemented on all PCs, laptops etc when unattended. No files or written information of a confidential nature are to be left where they can be read by unauthorised people.

Where data is computerised, it should be coded, encrypted or password protected both on a local hard drive and on a network drive that is regularly backed up. If a copy is kept on removable storage media, that media must itself be kept in a locked filing cabinet, drawer, or safe.

Data processors must always use the passwords provided to access the back-office IT system and not abuse them by passing them on to people who should not have them.

Personal data should not be kept or transported on laptops, USB sticks, or similar devices, unless prior authorisation has been received. Where personal data is recorded on any such device it should be protected by:

- a) ensuring that data is recorded on such devices only where necessary;
- b) using an encrypted system — a folder should be created to store the files that need extra protection and all files created or moved to this folder should be automatically encrypted; and
- c) ensuring that laptops or USB drives are not left where they can be stolen.

Failure to follow the Club's rules on data security may be dealt with via the Club's disciplinary procedure.

THIRD PARTY PROCESSING

Where we engage third parties to process data on our behalf, we will ensure, via a data processing agreement with the third party, that the third party takes such measures to maintain the Club's commitment to protecting data.

REQUIREMENT TO NOTIFY BREACHES

All data breaches will be recorded on our Data Breach Register. Where legally required, we will report a breach to the Information Commissioner within 72 hours of discovery. In addition, where legally required, we will inform the individual whose data was subject to breach.

TRAINING

New officers, staff, contractors and, where their duties require, members must read and understand the policies on data protection as part of their induction. The training includes information about confidentiality, data protection and the actions to take upon identifying a potential data breach.

All those approved to use the Club back-office IT system are trained to protect individuals' private data, to ensure data security, and to understand the consequences to them as individuals and the Club of any potential lapses and breaches of the Club's policies and procedures.

The Club will keep a record of training carried out and trainees will be required to sign that they have read and understood the policy.

RECORDS

The Club keeps records of its processing activities. These records will be kept up to date so that they reflect current processing activities.

DATA PROTECTION COMPLIANCE

Our Data Protection Lead is the Club Chairman, chairman@esgc.co.uk