

## **RAWSKILLS FC PRIVACY NOTICE**

### **1. What is this policy about?**

Rawskills Football Club needs to obtain and keep certain information about players and parents to allow it to offer football services. Laws about data protection set out rules on how personal information relating to individuals is obtained, processed, disclosed to others and transferred outside of the EU. Rawskills FC is committed to complying with the Data Protection Act 1998 (DPA) and the General Data Protection Regulation (known as GDPR) which will replace the DPA and subsequent national data protection laws which will apply once the UK leaves the EU at which point the GDPR will no longer apply to the UK.

This notice explains the types of information which Rawskills FC holds about players and parents and your rights in relation to that information.

### **2. What type of information is covered by data protection laws?**

The law protects all information which relates to an individual i.e. personal data.

Some information is considered special information because it relates to children, physical or mental health or includes biometric information. Such sensitive information is given special protection.

### **3. Principles of Data Protection**

Rawskills FC will ensure that it complies with the data protection principles:-

- a. fair, lawful and transparent processing of information;
- b. processing for specified, explicit and legitimate purposes;
- c. information is adequate, relevant and limited to what's necessary for the purpose for which it is obtained or maintained;
- d. information is accurate and kept up to date, with inaccurate information being corrected or deleted promptly;
- e. information is not kept for any longer than is necessary;
- f. all information is kept securely;
- g. information will not be transferred outside of the EU unless appropriate safeguards are in place.

“Processing” means collecting, recording, organising, structuring, storing, changing, retrieving, using, sharing, limited access to and deleting.

### **4. Types of personal information held about you**

Parents complete a registration form, in which we ask you for:

- Contact details, including emergency contacts
- Child's name, DOB, address, current school
- Bank payment reference
- Child health information, including allergies
- Photograph permissions
- First Aid permissions

***If you do not agree with your data being processed in accordance with this notice please do not register your child or let rafcsecretary@gmail.com know as soon as possible, in which case we will delete your information and your registration will not be able to proceed.***

We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal information for an unrelated purpose, we will tell you and we will explain the legal basis which allows us to do so.

## **5. Storing your information**

We use Google forms/sheets (Google Drive) to register your information. Here is a link to their privacy statement

<https://www.google.com/policies/privacy/>

We keep all the information about you and your children on Teamstuff. Here is a link to their privacy statement:

<http://www.teamstuff.com/privacy.html>

We also back up all club documentation to AWS S3. This is for FA or league related information: Here is the link to their privacy statement:

<http://aws.amazon.com/compliance/data-privacy-faq>

We use Mailchimp to send group emails. Here is a link to their privacy statement: <https://mailchimp.com/legal/policy> – Note every mailchimp email contains a working unsubscribe link.

Internally at Rawskills we ensure that all information about you and your children is stored electronically and securely (see Security below).

## **6. Keeping your information up to date**

You need to help us to ensure that the information which we hold about you and your children is up to date and correct so as soon as any details change (such as your address, phone numbers, email addresses, details of next of kin) you should tell us immediately.

## **7. Your Rights**

You have the following rights in relation to the personal information which we hold about you:

### **a. Right to withdraw consent**

Where you have consented to us processing your personal information, you are entitled to withdraw that consent at any time. If you wish to do so please contact [rafcsecretary@gmail.com](mailto:rafcsecretary@gmail.com) or complete the out-opt form on our website explaining which information you are referring to. We will stop processing this particular personal information as soon as possible after receiving your withdrawal except to the extent that we need to keep the information for regulatory purposes or in connection with legal

proceedings.. You will not be penalised in any way for withdrawing consent to any processing of your personal information.

**b. Right to object including to direct marketing**

You have the right to object, for reasons relating to your particular situation, to us processing your personal information, where we are processing your personal data for reasons of our legitimate interests. When we receive any objection to processing on this ground, we will restrict access to the relevant information (see paragraph e below) while we assess whether our legitimate interests override your objection. If we can demonstrate that they do or the information is needed for legal claims, we are allowed to continue to process your personal information; otherwise we will stop processing it. Where we are processing your data for other reasons such as compliance with our regulatory obligations we will continue to hold as much information as we need to in order to satisfy those obligations.

If you wish to object to us processing information about you for any of the above purposes please contact [rsfcsecretary@gmail.com](mailto:rsfcsecretary@gmail.com) or complete the opt out form on our website.

**c. Right of access – data subject access request**

This is commonly known as a "data subject access request" or simply a "subject access request". The purpose of a subject access request is for you to know about the personal information which we hold about you and to check that we are lawfully processing it.

Usually we will not charge you a fee for providing a copy of the information which you request but we may charge an administrative fee if you ask for further copies of the information or if your request is manifestly unfounded or excessive, in particular if it is repetitive.

Alternatively, if the request is unfounded or excessive we may refuse your request. If we refuse your request, we will explain to you why we have refused and you will have the right to complain to the Information Commissioner (whose details are set out below).

Before we provide copies of your personal information we need to be sure that the person making the request is actually you. Therefore, we may ask for further information to confirm that you are the person making the request, particularly if the request comes from a personal email account which is unfamiliar to us or by an unsigned letter or from someone who says that they are acting on your behalf.

We have to protect other people's personal information which means that we may have to remove or cover up information in a document before we can give you a copy. We also have to protect confidential information and intellectual property and so we may remove any information for this purpose.

We will respond to any data subject access request within one month unless your request is complex or numerous in which case we may extend the timeframe for our response up to a total of 3 months from the date of your request so long as we tell you within the first month and explain why we need the extra time.

If you email us your request we will provide electronic copies of the requested information.

If you wish to make a subject access request please contact [rsfcsecretary@gmail.com](mailto:rsfcsecretary@gmail.com). Please be specific in your request. If you make a very general request we may ask you to specify which information you would like to see.

**d. Right to request correction**

If you think that any personal information about you which we hold is incorrect or incomplete you have the right to request that the information is changed. If you wish to correct any information we hold about you please contact [rsfcsecretary@gmail.com](mailto:rsfcsecretary@gmail.com).

If we disagree that the information is incorrect, we will tell you why. In that scenario, we have the right to retain the information and you can ask us to add a supplementary statement.

While we are assessing whether the information is incorrect or incomplete we will restrict the information (see paragraph f below for further details).

If we have provided incorrect or incomplete information about you to someone else, we will update the information following your request to correct the information.

We will respond to your request within one month unless your request is complex in which case we will respond within 3 months.

**e. Right to request deletion – so called “right to be forgotten”**

In the following situations you have the right to have your personal information deleted:

- a. Where the personal information is no longer necessary for the purpose for which it was originally collected/processed;
- b. When we have asked you for consent to process your information and you have withdrawn that consent;
- c. When you object to the processing (see paragraph d below) and there is no overriding legitimate interest for continuing the processing;
- d. When the personal information was unlawfully processed; or
- e. When the personal information has to be erased in order to comply with a legal obligation.

We can refuse your request if the information is needed for current or potential legal claims.

If we have provided the information about you which you wish to be deleted, to someone else, we will, where possible, ask them to also delete the information.

If you wish to request that some information relating to you is deleted please contact [rsfcsecretary@gmail.com](mailto:rsfcsecretary@gmail.com) .

**f. Right to restrict processing**

If you tell us that you think some personal information we hold about you is incorrect or incomplete or you object to us processing your personal information for reasons of our legitimate interests (including profiling), we will restrict access to the relevant personal information while we assess whether or not it is incorrect/incomplete or

whether we are allowed to continue processing your personal information. This means that we will continue to store the relevant personal information but we won't use it for any other purposes.

If we no longer need the information but you need it for legal claims you may ask us to restrict access to it rather than delete it.

If we have previously provided the restricted information to someone else, we will, where possible, ask them to also restrict the information.

#### **g. Right to transfer of your information**

Where you have provided information to us and we are processing it via automated means either based on your consent or for the performance of your employment contract/contract for services, you have the right to request that the information is provided to you, or to someone else, in a commonly used electronic form.

We will not charge you for the transfer of your information.

We have to protect other people's personal information which means that we may have to remove some information before transferring your information.

We will respond to any request to transfer your information within one month unless your request is complex or numerous in which case we may extend the timeframe for our response up to a total of 3 months from the date of your request so long as we tell you within the first month and explain why we need the extra time.

If you wish to us to provide such information to you in this manner please contact [rsfcsecretary@gmail.com](mailto:rsfcsecretary@gmail.com).

If we do not transfer your information following a request for you to do so, we will tell you why as soon as possible and at least within one month of your request. You would have the right to complain to the Information Commissioner (whose details are set out below).

### **8. Sharing your personal information**

As we have explained above we share your information with Google Drive, Teamstuff, AWS S3 and Mailchimp.

We also share some of your personal information with other people outside of Rawskills, for example Surrey FA, Crowborough League, Epsom and Ewell League, Mid Sussex League.

Where we share your personal information with external service providers we protect it by requiring those service providers to take appropriate security measures to protect your personal information in line with our policies. We also tell our external service providers that they can only use your personal information for the purpose of providing the service to us and not for their own purposes. We only allow them to process your personal information for specified purposes and in accordance with our instructions.

We may also need to share your personal information with a regulator or to otherwise comply with the law.

## **9. Transfer of your personal information out of the EU**

Within the EU all businesses have to protect personal information in the same way as employers do in the UK. However, outside of the EU data protection laws vary from country to country, some have similar laws to the EU, others have very different laws.

Some of the providers we mentioned above (including Mailchimp) are based outside of the EU which means that your data will be transferred to the US. We will only transfer your personal information outside of the EU where there is adequate protection for your information or for legal claims.

## **10. Security**

A very important part of looking after the personal information which we hold about you is ensuring that it's secure.

We have considered how to protect your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed inappropriately. We have put in place measures to achieve these objectives.

All information about you will be held on secure databases or in locked filing cabinets.

However, data transmission over the internet and email cannot be guaranteed to be entirely secure. As a result, we cannot guarantee the security of your information and submission of information to us is therefore at your risk.

## **11. Breach of security**

If we discover that our security measures have failed and this results in personal information being lost, destroyed, corrupted or disclosed or someone accessing the information or passing it on without proper authorisation, we will assess the risk that such a breach may have on you. If the breach will result in a high risk of a negative impact for you we will tell you and we will tell the Information Commissioner

## **12. Deleting your personal information**

We shall keep your information for 2 years from the date that it was first uploaded or received and by using Rawsills FC you agree to us doing so. If you do not wish us to retain your information, please let us know as per your right to withdraw consent explained above.

## **13. Contact information**

We have appointed Martin Harris as our data protection officer. Martin can be contacted at [rxfcsecretary@gmail.com](mailto:rxfcsecretary@gmail.com). If you have any queries relating to your personal information or your responsibilities with respect to other people's personal information please contact [rxfcsecretary@gmail.com](mailto:rxfcsecretary@gmail.com)

The Information Commissioner is the UK supervisory authority with responsibility for data protection. Various ways of contacting the Information Commissioner are detailed on their website: <https://ico.org.uk/global/contact-us/>. You can complain to the Information Commissioner at any time.

#### **14. Date of and changes to this notice**

This policy is dated March 2018.

We reserve the right to update this notice at any time. We will post updates to this notice on our Intranet and send you an updated copy. We may also notify you in other ways from time to time about the processing of your personal information.