**TEMPLATE DATA PRIVACY POLICY**

# Notes for use

*This is a template Data Privacy Policy which addresses certain information and activities only.* ***PLEASE DELETE THESE DRAFTING NOTES BEFORE USE.*** *It relates to compliance with the General Data Protection Regulation (GDPR) which comes into effect on 25 May 2018.*

*The template Policy assumes that the Club/League:*

* *holds competitions*
* *has a website on which the Club/League posts photos of events and members*
* *has an online membership directory which is accessible by members only. (The policy does not address the issues relating to a hard copy membership directory.)*
* *has no sponsors*
* *has programmes for children and training programmes for which coaches are used (who are not employed by the Club/League)*
* *allows members to bring guests (but there is no record of the guest's details and therefore no use made of guest data)*
* *does not use any of the personal data it collects for marketing purposes (except to update members about Club/League events)*

*The template Policy assumes that the only personal data collected by the Club/League is:*

* *each member’s name, address, phone numbers, e-mail addresses, emergency contact details, date of birth, gender, and dependants’ names and ages*
* *the bank account or credit card details for each member (or person paying fees on the member’s behalf)*
* *each member’s membership number (TTiD)*
* *each coach's name, home address, e-mail addresses, phone numbers, qualifications and experience*

It is important to note that the template Policy does not address the issues which may arise if the Club/League collects any “sensitive” personal data (which includes health information). The rules relating to it are more onerous than for non-sensitive personal data so the Club/League should only collect sensitive personal data if it is necessary for the Club/League to do so. If the Club/League does need to collect sensitive personal data it should consult an expert on this matter ( <https://ico.org.uk/for-organisations/guide-to-data-protection/conditions-for-processing/> ).

*The template Policy assumes that the purposes for which the personal data is collected are:*

* *managing each member’s membership*
* *managing events, competitions and results*
* *sharing competition results with Table Tennis England / other clubs / other leagues / publishing them in newspapers or in other media*
* *reporting diversity data to Table Tennis England*
* *creating and managing an online membership directory*
* *posting photos of Club/League events and members to the Club’s/League’s website and social media pages.*

*This template Policy only addresses member and coaches’ information. It does not address any information collected about anyone else (e.g. suppliers to the Club, League or employees).*

*The template Policy does not address information collected via independent means or any information about cookies used on the Club’s/League’s website). It is important that the Policy reflects the data the Club/League collects and the uses made of it. Clubs/Leagues collect different types of data through their websites (with some not collecting any data in that way) and use different types of cookies. The Policy should be adapted to address the specific data collected. Clubs/Leagues should already have cookie policies.*

*Your Data Privacy Policy should be used in conjunction with privacy / processing statements at the time that data is collected.*

*You should consider these notes and the template carefully. The template Policy should not be used in the form in which it is drafted as it is important that the Policy reflects your Club/League, the data it collects and the uses it makes of that data. It will therefore need to be adapted by each Club/League.*

*If you intend to post a Data Privacy Policy on your website you may wish to present it in a layered fashion, for examples of layering see https://ico.org.uk/for-organisations/guide-todata-protection/privacy-notices-transparency-and-control/where-should-you-deliverprivacy-information-to-individuals/.*

*Clubs/Leagues should regularly review their Data Privacy Policy and should amend it as and when required. It is not necessary to ask for consent to the Data Privacy Policy.*

**TEMPLATE DATA PRIVACY POLICY**

1. **About this Policy** 
   1. This policy explains when and why we collect personal information about our members and instructors, how we use it and how we keep it secure and your rights in relation to it.
   2. We may collect, use and store your personal data, as described in this Data Privacy Policy and as described when we collect data from you.
   3. We reserve the right to amend this Data Privacy Policy from time to time without prior notice. we may be required to amend this Data Privacy Policy due to regulations. For any significant changes you will be notified but you are advised to check x URL for the latest Privacy Policy
   4. We will always comply with the General Data Protection Regulation (**GDPR**) when dealing with your personal data. Further details on the GDPR can be found at the website for the Information Commissioner (www.ico.gov.uk). For the purposes of the GDPR, we will be the “controller” of all personal data we hold about you.
2. **Who are we?** 
   1. We are [*name of club/league*]. We can be contacted at [*insert address, e-mail address and phone number*].
3. **What information we collect and why.**

|  |  |  |
| --- | --- | --- |
| Member's name, address,  telephone numbers,  e-mail, address(es). | Managing the Member’s  membership of the  National Governing  Body | Performing the Club’s/League’s contract with the Member.  For the purposes of our  legitimate interests in  operating the Club/League. |
| The names and ages of  the member’s dependents | Managing the Member’s  and their dependents’  membership of the  Club/League | Performing the Club’s/League’s contract with the Member. |
| Emergency contact details | Contacting next of kin in  the event of an  emergency | Protecting the Member’s vital interests and those of their dependents |
| Date of birth / age related  information | Managing membership  categories which are  age related | Performing the  Club’s/League’s contract  with the member |
| Gender | Provision of adequate facilities for members  Reporting Information to  Table Tennis England | For the purposes of our  legitimate interests in making  sure we can provide sufficient and suitable facilities (including changing rooms and toilets) for each gender  For the purposes of the legitimate interests of Table Tennis England to maintain diversity data required by funders |
| The Member’s name, TTID | Managing competition  and event entries and  results    Publishing  results and ranking | For the purposes of our  legitimate interests in holding  competitions and events for  the benefit of members. For the purposes of our legitimate interests in promoting the Club/League  For the legitimate interest to providing relevant tournament and player information to Table Tennis England and providing communications to players |
| Photos and videos of  members | Putting on the website  and social media pages  and using in press  releases | Consent. We will seek the  consent on their membership  application form and each  membership renewal form.  The member may withdraw  their consent at any time by  contacting us by e-mail or  letter |
| Member’s name and  e-mail address | Creating and managing  the online key members  directory | Consent. We will seek the  consent on their membership  application form and each  membership renewal form.  The member may withdraw  their consent at any time by  contacting us by e-mail or  letter |
| Bank account details of  the member or other  person making payment to  Table Tennis England | Managing the Member’s  and their dependants’  membership of the  Club/League the provision of services and events. | Performing the  club’s/league’s contract  with the Member |
| Member’s and former  member’s name and e-  mail address | To conduct surveys of  Members and former  members for the benefit  of the organisation and  the sport the  organisation and the  sport | For the purposes of our  legitimate interests in  operating Table Tennis  England and its capacity as  the National Governing body |
| Coach’s name address,  email addresses, phone  numbers and relevant  qualifications and/or  experience | Managing the coaching  at the Club/League | For the purposes of our  legitimate interests in  ensuring that we can contact  those offering instruction and  provide details of coaches to  members |

|  |  |  |
| --- | --- | --- |
| Member’s and former member’s name and email address | To conduct surveys of Members and former members for the benefit of the organisation and the sport the organisation and the sport | For the purposes of our legitimate  interests in operating Table Tennis  England and its capacity as the  national body |
| Coach’s name, address, email addresses, phone numbers and relevant qualifications and/or experience. | Managing instruction at the Club/League. | For the purposes of our legitimate interests in ensuring that we can contact those offering instruction and provide details of instructors to members. |

1. **How we protect your personal data** 
   1. We will not transfer your personal data outside the EU without your consent.
   2. We have implemented generally accepted standards of technology and operational security in order to protect personal data from loss, misuse, or unauthorised alteration or destruction.
   3. Please note however that where you are transmitting information to us over the internet this can never be guaranteed to be 100% secure.
   4. For any payments which we take from you online we will use a recognised online secure payment system.
   5. We will notify you promptly in the event of any breach of your personal data which might expose you to serious risk.
2. **Who else has access to the information you provide us?** 
   1. We will never sell your personal data. We will not share your personal data with any third parties without your prior consent (which you are free to withhold) except where required to do so by law or as set out in the table above or paragraph 5.2 below.
   2. We may pass your personal data to third parties who are service providers, agents and subcontractors to us for the purposes of completing tasks and providing services to you on our behalf (e.g. to print newsletters and send you mailings). However, we disclose only the personal data that is necessary for the third party to deliver the service and we have a contract in place that requires them to keep your information secure and not to use it for their own purposes.

1. **How long do we keep your information?** 
   1. We will hold your personal data on our systems for as long as you are a member of the Club/League and for as long afterwards as it is in the Clubs’/Leagues’ legitimate interest to do so or for as long as is necessary to comply with our legal obligations. We will review your personal data every year to establish whether we are still entitled to process it. If we decide that we are not entitled to do so, we will stop processing your personal data except that we will retain your personal data in an archived form in order to be able to comply with future legal obligations e.g. compliance with tax requirements and exemptions, and the establishment exercise or defence of legal claims.
   2. We securely destroy all financial information once we have used it and no longer need it.
2. **Your rights** 
   1. You have rights under the GDPR:
      1. to access your personal data
      2. to be provided with information about how your personal data is processed
      3. to have your personal data corrected
      4. to have your personal data erased in certain circumstances
      5. to object to or restrict how your personal data is processed
      6. to have your personal data transferred to yourself or to another business in certain circumstances.
   2. You have the right to take any complaints about how we process your personal data to the Information Commissioner:

<https://ico.org.uk/concerns/>

0303 123 1113.

Information Commissioner's Office

Wycliffe House

Water Lane

Wilmslow

Cheshire SK9 5AF

For more details, please address any questions, comments and requests regarding our data processing practices to our [Data Protection Manager] [*insert address or e-mail address*].

**Table Tennis England Responsibility Statement:**

**Table Tennis England takes all reasonable care to ensure that the information contained in its**

**Guidance is accurate, and that any opinions, interpretations and guidance expressed have been**

**carefully considered in the context in which they are expressed. However, before taking any**

**action based on the contents of this Guidance or any other Guidance provided by Table Tennis**

**England, readers are advised to confirm the up to date position and to take appropriate**

**professional advice specific to their individual circumstances.**