



Sale Sharks Supporters Club

Data Protection Policy and Procedures

1.0 Introduction

Sale Sharks Supporters Club (herein also referred to as SSSC) is an organisation run by a Committee of Volunteers comprising Officers and Members that are elected annually at the AGM. SSSC is committed to a policy of protecting the rights and privacy of individuals. SSSC needs to collect and use certain types of Data to maintain its list of members and to carry out its work. This personal information must be collected and dealt with appropriately.

The General Data Protection Regulation 2018 (GDPR) governs the use of information about people (personal data). Personal data can be held on computer or in a manual file, and includes Name, Address, Email and IP address. SSSC will remain the Data Controller for the information held. On occasions, other SSSC members will volunteer to assist at events or on the SSSC stand. The SSSC committee and volunteers will be personally responsible for processing and using personal information in accordance with the GDPR.

Committee Members and volunteers who have access to personal information will be expected to read and comply with this policy. SSSC will seek and record the permission of members and others to hold their data.

2.0 Purpose

The purpose of this policy is to set out the SSSC commitment and procedures for protecting personal data. SSSC regards the lawful and correct treatment of personal information as very important to successful working, and to maintaining the confidence of those with whom we deal with.

3.0 The GDPR Legislation

This contains principles for processing personal data with which SSSC will comply.

Personal data:

1. Shall be processed fairly and lawfully and shall not be processed unless specific conditions are met
2. Shall be obtained only for one or more of the purposes specified in the Regulation, and shall not be processed in any manner incompatible with that purpose or those purposes
3. Shall be adequate, relevant and not excessive in relation to those purpose(s)
4. Shall be accurate and, where necessary, kept up to date
5. Shall not be kept for longer than is necessary
6. Shall be processed in accordance with the rights of data subjects under the GDPR
7. Shall be kept secure by the Data Controller who takes appropriate technical and other measures to prevent unauthorised or unlawful processing or accidental loss or destruction of, or damage to, personal information.

The following list contains definitions of the technical terms we have used and is intended to aid understanding of this policy:

Data Controller – The people who decide what personal information SSSC will hold and how it will be held or used.

Data Protection Officer – The person on the management committee who is responsible for ensuring that it follows its data protection policy and complies with the GDPR

Data Subject/Service User – The individual whose personal information is being held or processed by SSSC (for example: a member or user of a service)

'Explicit' consent – is a freely given, specific and informed agreement by a Data Subject (see definition) to the processing of personal information about her/him.

Information Commissioner – The UK Information Commissioner responsible for implementing and overseeing the GDPR.

Processing – means collecting, amending, handling, storing or disclosing personal information

Personal Information – Information about living individuals that enables them to be identified – e.g. names, addresses, telephone numbers, email and IP addresses. It does not apply to information about organisations, companies and agencies but applies to named persons, such as individual volunteers or members of SSSC.

4.0 Applying the GDPR within the SSSC

Whilst access to personal information is limited to the Committee of SSSC and volunteers, the Committee may undertake additional tasks which involve the collection of personal details from members or others.

In such circumstances, we will let people know why we are collecting their data and it is our responsibility to ensure the data is only used for this purpose.

5.0 Correcting data

Individuals have a right to have data corrected if it is wrong, to prevent use which is causing them damage or distress or to stop marketing information being sent to them.

6.0 Responsibilities

The SSSC committee is the Data Controller under GDPR, and is legally responsible for complying with GDPR, which means that it determines what purposes personal information held will be used for.

The SSSC committee will consider legal requirements and ensure that it is properly implemented, and will through appropriate management, strict application of criteria and controls:

- Observe fully conditions regarding the fair collection and use of information
- Meet its legal obligations to specify the purposes for which information is used
- Collect and process appropriate information, and only to the extent that it is needed to fulfil its operational needs or to comply with any legal requirements
- Ensure the quality of information used
- Ensure that the rights of people about whom information is held, can be fully exercised under GDPR. These include:
 - The right to be informed that processing is being undertaken
 - The right of access to one's personal information
 - The right to prevent processing in certain circumstances and
 - The right to correct, rectify, block or erase information which is regarded as wrong information
- Take appropriate technical and organisational security measures to safeguard personal information
- Ensure that personal information is not transferred abroad without suitable safeguards
- Treat people justly and fairly whatever their age, religion, disability, gender, sexual orientation or ethnicity when dealing with requests for information
- Set out clear procedures for responding to requests for information.

The Data Protection Officer on the committee is the Membership Secretary:

Contact Details membership@salesupporters.co.uk

The Data Protection Officer will be responsible for ensuring that the policy is implemented and will have overall responsibility for:

- Everyone processing personal information understands that they are contractually responsible for following good data protection practice
- Everyone processing personal information is appropriately trained to do so
- Everyone processing personal information is appropriately supervised
- Anybody wanting to make enquiries about handling personal information knows what to do

- Dealing promptly and courteously with any enquiries about handling personal information
- Describe clearly how it handles personal information
- Will regularly review and audit the ways it holds, manages and uses personal information
- Will regularly assess and evaluate its methods and performance in relation to handling personal information
- The Committee and all volunteers are aware that a breach of the rules and procedures identified in this policy may lead to action being taken against them.

This policy will be updated as necessary to reflect best practice in data management, security and control and to ensure compliance with any changes or amendments made to the General Data Protection Regulation.

In case of any queries or questions in relation to this policy please contact the SSSC Data Protection Officer

7.0 Data collection

7.1 Informed consent

Informed consent is when:

- A Data Subject clearly understands why their information is needed, who it will be shared with, the possible consequences of them agreeing or refusing the proposed use of the data
- and then gives their consent.

SSSC will ensure that data is collected within the boundaries defined in this policy. This applies to data that is collected in person, or by completing a form.

When collecting data, SSSC will ensure that the Data Subject:

- Clearly understands why the information is needed
- Understands what it will be used for and what the consequences are should the Data Subject decide not to give consent to processing
- As far as reasonably possible, grants explicit consent, either written or verbal for data to be processed
- Is, as far as reasonably practicable, competent enough to give consent and has given so freely without any duress
- Has received sufficient information on why their data is needed and how it will be used.

7.2 Data Storage

Information and records relating to SSSC members will be stored securely and will only be accessible to the Committee and volunteers.

Information will be stored for only if it is needed or required by statute and will be disposed of appropriately.

It is SSSC's responsibility to ensure all personal data is non-recoverable from any computer system previously used within the organisation, which has been passed on/sold to a third party.

This policy will be updated as necessary to reflect best practice in data management, security and control and to ensure compliance with any changes or amendments made to the GDPR.

7.3 Disclosure

SSSC will not share data with other agencies, businesses, organisations or individuals unless it is legally obliged to.

The Data Subject will be made aware in all circumstances how and with whom their information will be shared. There are circumstances where the law allows SSSC to disclose data (including sensitive data) without the data subject's consent.

These are:

1. Carrying out a legal duty or as authorised by the Secretary of State
2. Protecting vital interests of a Data Subject or other person
3. The Data Subject has already made the information public
4. Conducting any legal proceedings, obtaining legal advice or defending any legal rights.

SSSC regards the lawful and correct treatment of personal information as very important to successful working and to maintaining the confidence of those with whom we deal. SSSC intends to ensure that personal information is treated lawfully and correctly.

7.4 Risk Management

The consequences of breaching Data Protection can cause harm or distress to service users if their information is released to inappropriate people, or they could be denied a service to which they are entitled. The Committee should be aware that they can be personally liable if they use customers' personal data inappropriately. This policy is designed to minimise the risks and to ensure that the reputation of the SSSC is not damaged through inappropriate or unauthorised access and sharing.

7.5 Destroying personal data

Personal data should only be kept for as long as it is needed i.e. only keep that data for the duration of membership and securely dispose of no later than six months after the membership period has lapsed. (Note this is to give members sufficient time to renew following the end of a membership period.) We will ensure that this information is confidentially destroyed at the end of the relevant retention period.

8.0 Further information

If members of the public/or stakeholders have specific questions about information security and data protection in relation to the SSSC please contact the Data Protection Officer.

The Information Commissioner's website (www.ico.gov.uk) is another source of useful information.

Signed: J.Parsonage (Chair)

Agreed, reviewed and revised by the SSSC Committee at its meeting held on 11 March 2019.

Review Date: Annually at the AGM or when there is a change of Membership Secretary or Chair.