

Thornbury Indoor Bowls Club – Privacy Policy

Thornbury Indoor Bowls Club (The Club) is committed to respecting your privacy. This privacy notice explains how the Club uses personal information before, during and after your membership with the Club. It also explains how the Club complies with the law on data protection, what your rights are and for the purposes of data protection the Club will be your data controller of any personal data.

The Club has not appointed a Data Protection Officer to oversee compliance with data protection laws, as it is not required to do so, but the Chair of the Club has overall responsibility for compliance in the Club.

1. Personal information we may collect from you

When you sign up for membership of the Club you will be asked to provide the Club with:

- Personal contact details that allows it to contact you directly such as name, title, address, email address and telephone numbers;
- Date of birth;
- Gender;
- Emergency contact details;
- Previous Bowling Club memberships;
- Years of bowling experience (for a certain competition).

During your membership, the Club may record:

- Records of interactions with the Club such as availability for matches, matches played, telephone conversations, emails and other correspondence and your instructions to the Club;
- Images in video and/or photographic form and voice recordings;
- Coaching / teaching qualification start and end dates;
- Any coaching code or official number;

2. Special categories of personal information

The Club may also collect, store and use the following “special categories” of more sensitive personal information:

- Your race or ethnicity, and
- Your health including any medical conditions.

N.B. The Club may not collect all of the above special category personal information.

To collect and use your **personal information**, it is necessary for the Club under the GDPR to have a lawful basis and the Club will apply the most appropriate of the following:

- **Consent** - you provide your information to the Club so that it can administer the organising and playing of bowls either home or away.
- **Protect your vital interests** - such as a life or death situation or to protect you from harm, or the vital interests of another person.
- A task in the **public interest** or where it is **required for the Club** to use your personal information.
- **Legitimate interests** – where the Club needs to process your data for our legitimate interests, or the legitimate interests of a third party such as Bowls England, GBA and others.

For the **special category data**, such as your medical information, the Club will rely on the following conditions:

- **Explicit consent** – this will usually be in writing.

- **Protect vital interests** – when you are unable to give consent and you or someone else is at risk of harm.
- Establishment, exercise or **defence of legal claims** or whenever courts are acting in their judicial capacity.

3. Where we collect your information

The Club typically collects personal information when you join or renew your membership of the Club. If you are providing details of emergency contacts, they have the right to know and to be aware of how the Club collects, stores and uses their personal data, therefore, please share this privacy notice with them. They have the same rights as set out in “Your rights”, see below.

4. How does the Club processes and uses your data?

Purpose	Personal Information	Lawful Basis
All Members		
To administer your membership with the Club.	Contact details, name, address, telephone & email.	To effectively manage and administer your membership and to allow you to fully participate in the Club.
Retention of records.	All personal information.	Where the Club has a legitimate interest in relation to complaints / claims or where there is a legal / regulatory obligation to do so.
Security of IT Systems.	All personal information.	The Club will take all reasonable steps to ensure that any records held locally on the Club Secretary’s pc have been properly protected with passwords and the pc is kept up to date with appropriate anti-virus protection.
For the purpose of promoting the sport and the Club	Images in video / photographic form.	The Club will ask for your explicit consent prior to using your images.
Complying with H&S requirements	Attendance Records	The Club has a legal obligation and a legitimate interest to provide members with a safe environment and to comply with Thornbury Leisure Centre’s policies and procedures.
Facebook and other IT systems	Usage records	The Club is interested in how many members use the Club’s Website and any other IT systems that it might develop.
Arranging trips or transportation	Emergency contact details and health / medical information	Necessary to make appropriate arrangements for trips
Your physical or mental health (including injuries) or disabilities to ensure your H&S, fitness to play or to make appropriate adjustments so you can play	Medical and health information	The Club processes this special category personal data in line with section 2 above.

Gathering Evidence for possible grievance or disciplinary hearings	All personal information we collect including any disciplinary and grievance information	The Club has a legitimate interest in providing a safe and fair environment for all members and the effective management of any disciplinary hearings or appeals.
Equal Opportunities Monitoring	Name, title, date of birth, gender, race, ethnicity, health and medical information	The Club has a legitimate interest in promoting an inclusive, fair and accessible environment.

5. What The Club does with the information

All the personal data is processed by the Club sole for the organising and playing of indoor bowls. This could involve contacting you by telephone, emails or post. If you become an Officer or hold some other role within the Club, you will be asked to consent to publishing your name and contact telephone number in the handbook and if appropriate on Selection Availability and competition entry cards.

6. Disclosure of Information

The Club shares personal information with the following parties:

- Any party approved by you;
- To any governing bodies or regional bodies for indoor bowls to allow them to properly administer bowls on a local, regional and national level;
- Government or other regulators: where we are required by law or to assist with their investigations or initiatives;
- Police, law enforcement and security services: to assist with the investigation and prevention of crime and the protection of national security.

7. How long will the Club keep your information

The Club will retain your data only for as long as it is needed in order to administer the Club's activities and investigations. Usually, this will be for 6 years, but it will vary depending on the type of issue involved since that creates different types of records. Information that may be relevant to personal injury or discrimination claims may be retained until the limitation for those types of claims has expired. For personal injury or discrimination claims this can be for an extended period as the limitation period might not start to run until long after you have left the Club.

8. IT systems and transferring your information overseas

Please note that your personal data stored on English Indoor Bowls Association (EIBA) National Database may be stored on servers in countries outside the European Economic Area (EEA). If this is the case EIBA has received assurances from their third-party contractor that they will handle your data in line with GDPR requirements.

9. Your rights

You have a number of rights relating to your information:

- to see what the Club holds;
- to ask it to share your data with another party;
- ask the Club to update incorrect or incomplete details;
- to object to or restrict processing of your data;
- to make a complaint about how the Club is handling it;

If you have given the Club your permission to use your information you also have the right to withdraw that permission at any time in the future. If you decide to withdraw your consent to certain personal

data you may not be able to fully interact with the Club, for example, withdrawing telephone and/or email contact will affect the Club's ability to inform you of any last-minute changes.

Whilst this policy sets out a general summary of your legal rights in respect of personal information, this is a complex area of law and more information can be found on the Information Commissioner's website <https://ico.org.uk/for-the-public/> .

10. Questions or Concerns

If you have any worries or questions about how your personal information is handled please contact The Club Secretary, whose details are published each year in the handbook.

11. Keeping Your Personal Data Up to Date

It is important that you ensure that your personal data that the Club holds about you is accurate and up-to-date and you should let the Club know if anything changes, for example, if you change your phone number or email address. You will be able to update some of the personal information each year when completing a membership application form but at other times you should contact the Club Secretary, whose details are published in the handbook produced each season.

12. Changes to This Policy

The Club may update this policy notice from time to time. When the Club changes this policy in any material way, it will update the version at the bottom of these pages. For any significant changes the Club will try to give you reasonable notice unless it is prevented from doing so. Where required by law the Club will seek your consent to changes in the way in which it uses your personal information.

13. Independent Advice

For independent advice about data protection, privacy and data sharing issues, you can contact the Information Commissioner's Office (ICO) at:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire SK9 5AF

Tel: 0303 123 1113 (local rate) or 01625 545 745 if you prefer to use a national rate number.
Alternatively, visit ico.org.uk or email casework@ico.org.uk.

Secretary – Thornbury Indoor Bowls Club