

## GDPR Compliance Statement

The General Data Protection Regulations (GDPR) which comes into force on the 25th May 2018 build upon the Data Protection Act 1998 and the EU Privacy and Electronic Communications Regulations (PECR) 2003. GDPR takes the requirements for data protection, capture and use as already enacted in the laws above; and provides additional data transparency and control on organisations whilst empowering individuals with the right to know what is being stored, how it is being used, and the procedure for correcting or removing their details.

Taunton Longsword Association (TLA) captures, processes and uses individual members information for the sole purpose of administering the club membership and related activities. Where we pass on your information to 3rd parties, we do this specifically for club affiliation purposes (e.g. membership of the AHA), for insurance purposes (e.g. with the IMASA), and for ordering membership cards. We may also disclose information to other third parties for the booking of events or ordering club t-shirts. Where we share information with 3rd parties it will always be the least amount possible and only where specifics are requested.

All TLA members' personal information held by the TLA is processed under the GDPR category of "Legitimate Cause". The following table identifies what we capture, where it is stored, and why we need it.

### Data Identification:

- "Membership Form" : the online, Google Form, used when signing up to membership
- "Membership Roll" : the processed data from the form into a usable and simplified form.
- "Attendance Record" : the weekly paper sign in/out sheet that is typed up to record session numbers. The paper copy is destroyed once digitised.

<u>Data Captured</u>	<u>Where Used/Why</u>	<u>3rd Parties</u>	<u>Data Storage Access</u>	<u>Data Lifespan</u>
Full Name	Membership Form Membership Roll Club Cards Attendance Record Facebook page(s) Website	AHA - affiliation IMASA - insurance ID Card printer Neyman Fencing The Knight Shop Facebook page(s) WordPress - website	Committee Only	Membership +12-months
Date of Birth	Membership Form Membership Roll	AHA - affiliation	Committee Only	Membership +12-months
Address	Membership Form Membership Roll	None	Committee Only	Membership +12-months
Email Address	Membership Form	AHA - affiliation	Committee Only	Membership

	Membership Roll PayPal Payments	IMASA - insurance PayPal - subs Neyman Fencing The Knight Shop		+12-months
Mobile Number	Membership Form	None	Committee Only	Membership only
Relevant Medical Conditions	Membership Form	Paramedics/NHS	Committee & First-Aid if incident occurs	Membership only
Unspent Convictions	Membership Form	None	Committee Only	Membership only
Former Club Disciplinarys	Membership Form	None	Committee Only	Membership only
'Next of Kin'	Membership Form	None	Committee Only	Membership only
'Next of Kin' Phone	Membership Form	None	Committee Only	Membership only
Website Biography	Individually submitted (optional)	WordPress Server	Public Domain	Membership only

#### **Data Limitations:**

Members who communicate their personal details to 3rd parties directly (e.g. setting up a kit supplier account) should direct all GDPR enquiries to the organisation directly. Where TLA follow-up or communicate on your behalf (e.g. official confirmation you are a member of TLA), please contact TLA under GDPR to ascertain the information transferred.

Personal data that has been shared via the internet by members, potential members, or anyone engaging with the TLA whether interested in joining or just out of curiosity should be aware that their personal data processing is governed by the service intermediary they have used. For example, if you like our Facebook page, it is Facebook's GDPR policy which covers the interaction; the same should be considered for internet viewing (browser) and email (provider).

#### **Data Accuracy:**

It is beholden on TLA to ensure total data accuracy. Any TLA member may request to see what data is stored by the TLA, how it has been used, and the procedures in place to ensure data protection. Please do this in writing, clearly stating that it for a "GDPR information request". TLA will have not more than 30-days in which to respond and, although unlikely, may levy a proportionate fee to provide said information. Should you require corrections to your data (e.g. moving house, change of mobile number) please inform the TLA Secretary at your earliest convenience. Where data has been passed to 3rd parties, and that data is now incorrect, GDPR places a burden on TLA to forward the corrected data to the 3rd party so that they may update their records. Under GDPR, individuals have the right to also request data transparency directly with the 3rd party(ies).

For non-TLA members and people whom have contacted the TLA via a public-facing medium (e.g. email, website, Facebook, Twitter, etc) we will store your details as long as is necessary to facilitate your enquiry or action request. If you are a waiting list, your details will be kept for as long as that list is in existence PLUS 12-months. This is so we can inform you if future places open up if you are unable to join the first time round. If you engage in business dealings/transactions with TLA, we will keep your information indefinitely (e.g. email address, name, email contents) as a record of the club business dealings and in case of audit. Where possible, data will be anonymised or deleted.

For TLA members who leave the club/membership is not renewed, your details will be kept on file for at least 12-months after your membership lapses (until the next Membership cycle and data clean) at which point it will be anonymised or deleted. Attendance records will be kept indefinitely, with personal information (names) anonymised to ensure GDPR compliance

#### **Requesting Data Transparency:**

GDPR places a responsibility on TLA to ensure we can let you know precisely what information we hold on you, what it looks like (the actual data) and the procedures for keeping it safe. Please address all GDPR requests to the Secretary via the club email [tauntonhema@gmail.com](mailto:tauntonhema@gmail.com) with the subject line "GDPR information request". TLA has 30-days in which to reply and although unlikely, is permitted to levy a proportionate fee. TLA reserves the right to refuse GDPR information requests should they be deemed spurious or an abuse of the Regulations.

#### **Data Breach Notification:**

TLA take data protection extremely seriously and all data is stored securely on our club Google Drive that has access limited to the serving Committee members. We rely on notification from Google should their systems be compromised, and undertake to remedy and such breaches as a matter of urgency, including removing stored data from the drive to a secure local computer, unit such a time the online storage is secured once more. Where a breach has occurred, we will inform all members as well as the ICO within 72-hours.

#### **GDPR Complaints Procedure:**

Should you feel that TLA has failed in some aspect of GDPR and the processing of your personal data; in the first instance, please inform the TLA so that we may investigate and seek to correct our systems, should they require it. If our response to your complaint is unsatisfactory, you should contact the Information Commissioner's Office (ICO) and utilise their procedure: <https://ico.org.uk/for-the-public/raising-concerns/>.

#### **Data Protection Officer:**

The TLA club Secretary is the defacto Data Protection Officer, although it is the responsibility of all Committee members to ensure data security and compliance.