

Coxheath and Farleigh junior football club  
Data Protection Policy -updated August 2023

1. About this policy

- 1.1 This policy is to enable our club, in conjunction with our members, the FA and the leagues we are affiliated to, to deal with data protection matters. It relates to all those who come into personal data relating to our club during the course of their involvement with us.
- 1.2 Our club handle personal data in regard to current and former players and their parents/guardians; official volunteers; elected committee members; referees; coaches and team managers. It also encompasses our sponsors, suppliers, the FA and leagues that we affiliate to, and any other individuals that we communicate with.
- 1.3 In your formal capacity with the club, you may process personal data on our behalf and we will process the same in regard to you. We recognise the need to treat all personal data in an appropriate manner, in accordance with General Data Protection Regulation (GDPR) that is currently in place.
- 1.4 Correct and lawful treatment of this data will maintain confidence in the club, and protect the rights of those mentioned in 1.2 above. This policy sets out our data protection responsibilities and highlights the obligations of the club, which means the obligations of those parties mentioned in 1.2 above.
- 1.5 You are obliged to comply with this policy when processing personal data on behalf of the club, and this policy will help you to understand how to handle personal data.
- 1.6 The club management committee will be responsible for ensuring compliance with this policy. Any queries relating to this policy or if you have any data protection concerns, you should contact the club secretary.
- 1.7 We process personal data in regard to club administrative and management purposes, as well as complying with legal requirements. The purpose of holding this personal data is to be able to deal with club business, and the legal basis for processing your personal data in this way is the relationship we have with you. We will delete after the end of

your relationship with the club, unless it is a legal or regulatory need to retain it for a period of time. If you do not provide the relevant data we require, you will likely not be able to have a relationship with our club.

## 2. What we need from you.

2.1 To assist with our compliance with GDPR we will need you to comply with the terms of this policy. We have set out this section but please do read the full policy carefully.

2.1.1 Please help us to comply with the data protection principles, that are set out briefly in section 3 of this policy and in further detail below.

2.1.2 Please ensure that you only provide data in accordance with our transparent processing as set out in our Privacy Notice.

2.1.3 Please only process personal data for the purposes which we have collected it. If you wish to use it for another purpose, please speak to the club secretary before progressing further.

2.1.4 Please do not ask for further information about any relevant party before checking with the club secretary.

2.1.5 If you are asked to correct a party's personal data, please ensure that you can identify that party and, where you have been able to identify them, process the relevant updates.

2.1.6 Please comply with the retention requirements detailed in our Privacy Notice and ensure that if you still retain information which falls outside of such requirements, that you delete or destroy it securely.

2.1.7 Please treat all personal data as confidential. When stored in an electronic format you should consider whether it should be password protected and in limiting the number of relevant people who have access to it. If it stored in hard copy format then please ensure that it is kept locked away at all times when not in use.

2.1.8 If you are planning on sharing personal data with anyone new or with a party outside the club or FA structure, please speak with the club secretary before doing so, who will be able to confirm the correct provisions are in place and that there is a lawful basis to share it.

2.1.9 If you receive a subject access request, or if you think that someone is making such a request, please contact the club secretary. This should be done as soon as possible, as there are strict timelines in which to comply.

2.1.10 If you think that there has been a data breach (for example that you have lost personal data or a personal device which contains personal data, or you have been informed that someone else has done so, then please speak with the club secretary who will assist in responding.

If you have any questions at any time, please contact the club secretary. We are here to help.

### 3. Data protection principles.

3.1 Anyone processing personal data must comply with the enforceable principles of data protection. Personal data must be:

3.1.1 Processed lawfully, fairly and in a transparent manner;

3.1.2 Collected for only specified, explicit and legitimate purposes;

3.1.3 Adequate, relevant and limited to what is necessary for the purpose(s) for which it is processed;

3.1.4 Accurate and, where necessary, kept up to date;

3.1.5 Kept in a form which permits identification of individuals for no longer than is necessary for the purpose(s) for which it is processed;

3.1.6 Processed in a manner that ensures its security by appropriate technical and organisational measures to protect against unauthorised or unlawful processing and against accidental loss, destruction or damage.

3.1.7 We are responsible for and must be able to demonstrate compliance with the data protection principles listed above.

### 4. Fair and lawful processing.

4.1 The policy aims to ensure that our data processing is done fairly and without adversely affecting the rights of the individual.

4.2 Lawful processing means data must be processed on one of the legal bases set out in the GDPR. When special category personal data is being processed, additional conditions must be met.

### 5. Processing for limited purposes.

5.1 The club collects and processes personal data via the FA secure portal. This is data we receive directly from an individual and data we may receive from other sources.

5.2 We will only process personal data for the purposes of the club as agreed by its management committee, Kent FA or the FA, or as

specifically permitted by the GDPR. We will let individuals know what those purposes are when we collect data or as soon as possible after.

## 6. Consent.

- 6.1 One of the lawful bases on which we may be processing data is the individuals consent.
- 6.2 An individual consents to us processing data for club purposes if they clearly indicate a specific and informed agreement, either by statement or positive action.
- 6.3 Individuals can withdraw their consent at any time and such withdrawal must be promptly honoured. Consents should be renewed at the start of each season, via the club registration form.
- 6.4 Explicit consent is usually required for automated decision making and for data transfers, and for processing special category personal data. Where under eighteens are involved then the consent must be in writing from the parent or guardian.
- 6.5 Where consent is our legal basis for processing, we will need to maintain records of when and how the consent was provided.
- 6.6 Our privacy notice sets out the lawful basis on which we process data of our players, their parents and guardians, and managers, coaches and other volunteers.

## 7. Notifying individuals.

- 7.1 Where we collect personal data directly from individuals, we will inform them about:
  - 7.1.1 the purpose(s) for which we intend to process that personal data;
  - 7.1.2 the legal basis on which we are processing that personal data;
  - 7.1.3 where that legal basis is a legitimate interest, what that interest is;
  - 7.1.4 where that legal basis is legally or FA statutory or contractual, any possible consequences of failing to provide that personal data;
  - 7.1.5 the types of third parties, if any, with which we will share that personal data, including any data transfers;
  - 7.1.6 their rights as data subjects, and how they can limit our use of their personal data;
  - 7.1.7 the period for which data will be stored and how that period is determined;

- 7.1.8 any automated decision-making processing of that data and whether the data may be used for any further processing, and what that further processing is;
- 7.1.9 If we receive personal data about an individual from other sources, we will process accordingly the above information as soon as possible and let them know the source that we received their personal data from;
- 7.2 We will also inform those whose personal data we process that we, the club, are the data controller in regard to that data, and which officers on the club are responsible for data protection.

## 8. Adequate, relevant and non-excessive processing.

- 8.1 We will only collect personal data that is required for the specific purpose notified to the individuals;
- 8.2 You may only process personal data if required to do so in your official capacity with the club. You cannot process personal data for any reason unrelated to your duties;
- 8.3 The club must ensure that when personal data is no longer needed for specified purposes, it is deleted or anonymised.

## 9. Accurate data.

We will ensure that personal data we hold is accurate and kept up to date via the FA secure portal. We will check the accuracy of personal data at any point of collection and, at least, at the start of each season. We will take all reasonable steps to destroy or amend inaccurate or out of date data.

## 10. Timely processing.

We will not keep personal data longer than is necessary for the purpose(s) for which they were collected. We will take all reasonable steps to destroy or delete data which is no longer required, as per our privacy notice.

## 11. Processing in line with data subjects' rights.

### 11.1 As data subjects, all individuals have the right to:

- 11.1.1 Be informed of what personal data is being processed;

- 11.1.2 Request access to any data held about them by the club;
- 11.1.3 Object to processing of their data for direct marketing purposes (including profiling);
- 11.1.4 Ask to have inaccurate or incomplete data rectified;
- 11.1.5 Be forgotten (deletion or removal of personal data);
- 11.1.6 Restrict processing;
- 11.1.7 Data portability; and
- 11.1.8 Not be subject to a decision which is based on automated processing.

11.2 The club is aware that not all individuals' rights are absolute, and any requests regarding the above should be reported to the management committee, and if applicable escalated to Kent FA for guidance.

## 12. Data security.

- 12.1 We will take appropriate security measures against unlawful or unauthorised processing of personal data, and against the loss of, or damage to, personal data.
- 12.2 We have proportionate procedures and technology to maintain the security of all personal data.
- 12.3 Personal data will only be transferred to another party to process on our behalf where we have a GDPR compliant agreement in place with that party.
- 12.4 We will maintain data security by protecting the confidentiality, integrity and availability of the personal data.
- 12.5 Our security procedures include:
  - 12.5.1 Processing of relevant personal data via the secure FA portal;
  - 12.5.2 Locked desks, cabinets and cupboards;
  - 12.5.3 Methods of disposal – paper documents will be shredded. Digital storage devices physically destroyed.
  - 12.5.4 Equipment - screens and monitors must not show personal data to non-authorised users, and should be password protected when unattended.
  - 12.5.5 Personal devices – anyone accessing or processing the club's personal data on their own device, must have and operate a password only access or similar lock function, and should have appropriate anti-virus protection. These devices must have the club's

personal data removed prior to being replaced by another device or prior to such individual ceasing to maintain a relationship with the club.

13. Disclosure and sharing of personal information.

13.1 We share personal data with the FA, Kent FA and with the leagues that the club are affiliated to, using the FA secure portal.

13.2 We may share personal data we hold if we are under a duty to disclose or share an individual's personal data in order to comply with any legal obligation' or in order to enforce or apply any relationship with the individual or other agreements; or to protect our rights, property, or safety of club volunteers, players, or other individuals associated with the club, leagues etc.

14. Reporting a personal data breach.

14.1 We may need to notify the applicable regulatory body and the individual.

14.2 If you know or suspect that a personal data breach has occurred, inform a member of the management committee immediately, who may need to escalate it to Kent FA as appropriate. You should preserve all evidence relating to a potential personal data breach.

15. Dealing with subject access requests.

15.1 Individuals may make a formal request for information we hold about them. Anyone who receives such a request should forward it to the club secretary immediately, and where necessary it may be escalated to Kent FA for guidance. Nobody should feel bullied or pressurised into disclosing personal information.

15.2 Access requests must be made in writing – by email or in a letter.

16. Accountability.

16.1 The club must implement appropriate technical and organisational measures to look after personal data, and is responsible for, and must be able to demonstrate compliance with data protection principles;

16.2 The club must have adequate resources and controls in place to ensure and to document GDPR compliance, such as:

16.2.1 Providing fair processing notice to individuals at all points of data capture;

16.2.2 Enabling all volunteers in regard to this data protection policy; and

16.2.3 Reviewing the privacy measure implemented by the club.

17. Changes to this policy.

We reserve the right to change this policy at any time. Where appropriate, we will notify you by email or via social media.

Author: Martin Colwell, August 2023.