

Norwich Last Stand

Data Protection and Privacy Policy

Revised: January 2019



Introduction

The General Data Protection Regulation ('GDPR') replaces the EU Data Protection Directive of 1995 and supersedes the United Kingdom (UK) Data Protection Act 1998. The purpose of GDPR is to protect the "rights and freedoms" of natural persons (i.e. living individuals) and to ensure that personal data is not processed without their knowledge, and wherever possible, that it is processed with their Consent. The UK has subsequently implemented GDPR under the Data Protection Act 2018. For more information, please visit:

<https://ico.org.uk/for-organisations/data-protection-act-2018/>.

Definitions:

'**Data Subject**' is a living individual for whom data is about.

'**Personal Data**' is any information relating to an identified or identifiable data subject; an identifiable data subject is one who can be identified, directly or indirectly, in particular by reference to an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that data subject.

'**Special Categories of Personal Data**' includes personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a data subject or data concerning a data subject's sex life or sexual orientation.

'**Data Controller**' is an individual or organisation which determines the purposes and for which manner any personal data are, or are to be, processed.

'**Data Protection Officer**' refers to an individual who is responsible for data protection. In the case of the club, this is the current serving Secretary.

'**The Club**' refers to Norwich Last Stand.

'**Player**' refers to any individual who may or may not be members of the club but who attend club nights or events.

'Club Night' refers to the weekly gaming sessions the club which run on Thursday evenings.

'Committee' refers to the group of members elected by the club to manage the running of it. Committee positions include: President, Secretary and Treasurer.

'Event' refers to specific gaming sessions other than club nights which include tournaments, campaigns, apocalypse days and hobby days which are organised and run by the club.

'Personal Data Breach' refers to a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data. This includes breaches that are the result of both accidental and deliberate causes. It also means that a breach is more than just about losing personal data.

'Information Commissioner's Office (ICO)' is the supervising authority for Data Protection within the UK.

'Material Scope' the Data Protection Act 2018 applies to the processing of personal data wholly or partly by automated means (i.e. by computer) and to the processing other than by automated means (i.e. paper records) that form part of a filing system or intended to form part of a filing system.

'Territorial Scope' - the Data Protection Act 2018 will apply to all data controllers that are established in the UK while the GDPR elements apply to all data controllers within member states within the European Union ('EU') who process the personal data of data subjects, in the context of that establishment. It will also apply to data controllers outside of the EU that process personal data in order to offer goods and services, or monitor the behaviour of data subjects who are resident in the EU.

The Club's Purpose for Data Collection

For the purposes of record keeping and in accordance with Health and Safety Law and Insurance contractual obligations, the club is required to keep registers for club nights and Events.

For club nights, the club requires players to provide their first name name and first initial of their surname. This is for the purpose of monitoring club night attendance and fees which would require paying. Additionally and for consenting individuals who have agreed to be keyholders for the club, their names and contact telephone numbers are collected.

For events, the club requires players to provide their full name and a means of contact, namely an email address and/or phone number for the purposes of event organisation such as drawing

games. Additionally, should the event be cancelled, rescheduled or altered for whatever reason, the club has the means to directly contact any affected players.

The club also runs a closed Facebook group, however it has no control over the personal data within potentially held within data subjects' Facebook profiles. Data subjects and players are advised to carefully review Facebook's data protection policies and procedures and take appropriate privacy steps to safeguard any personal data held on Facebook profiles. To learn and read more, please see Facebook's "Privacy Basics" page located at: <https://www.facebook.com/about/basics/manage-your-privacy>.

The club does not utilise mailing lists or any other form of direct marketing and as any such personal data is not utilised for such purposes nor is it passed to any third party for this purpose. Should this change, the club will inform all data subjects and players to seek express consent before any processing occurs.

How the Club Stores Personal Data

The club primarily maintains a structured paper based filing system but may transfer such data to electronic spreadsheets for both club nights and events. Paper based data is stored at the club in a locked cupboard. Only the committee has access to this data and it is destroyed when no longer required.

Data Subject and Player Rights

Access to Data

Under the Data Protection Act 2018 and GDPR, data subjects and players have the right to:

- Confirmation that their personal data is being processed;
- Access their personal data; and,
- Other supplementary information.

This can be done at any time, free of charge, by contacting the club's data protection officer in writing which includes emails. The club can charge an administration fee if:

- The request is manifestly unfounded or excessive, particularly if it is repetitive; and,
- To comply with requests for further copies of the same information.

Any fees charged will be based purely on the cost of providing the information. In the case of manifestly unfounded or excessive requests, the club can also refuse to respond. If so, the club will inform the data subject or player why and inform them of their right to complain to the

supervising authority, in this case, the ICO. They should make any complaint without undue delay and within the latest of one month. The club is obliged to provide the information without delay and at the latest within one month of receiving a request.

In situations where requests are complex or numerous, the club will extend this deadline by a further two months and inform the data subject or player of this, and why this is necessary within one month of receiving the request.

Right to Rectification and Erasure

Data subjects and players can at any time have any erroneous data held about them by the club corrected. Requests for rectification should be made verbally or in writing to the club's data protection officer.

Data subjects and players can at any time request to have their personal data held by the club erased. This is also commonly referred to as the 'right to be forgotten'. Requests for erasure should be made in writing to the club's data protection officer.

In either case, the club is obligated to respond within one month of receiving a request for rectification or erasure. In certain circumstances this would not be possible, especially with erasure, and the club will respond with reasons why where this is the case.

The Club's Obligations in the Event of a Personal Data Breach

In the event of a personal data breach of any kind, the club will immediately assess the impact of the breach. If there is a risk of impact to data subjects or players, the club is obligated to notify the ICO of the personal data breach within 72 hours from becoming aware of it. In addition, the club will also inform all affected data subjects and players of the breach and the risks identified without undue delay.

The club will document the personal data breach and identified risk and adjust its processes and procedures to prevent further breaches.

Further Information or Questions

If you have any additional queries or wish to know more, please contact a member of the club's committee who will be able to help further.