

## **West Bridgford Hockey Club**

### **Privacy Notice For Our Members**

#### **1. What is this document and why should you read it?**

This privacy notice explains how and why we may use personal information we collect before, during and after your membership with us. This notice applies to you if you:

- have registered to become a member of West Bridgford Hockey Club (the “**Club**” or “**WBHC**”);
- are an existing member of WBHC; or
- are a former member of WBHC.

This notice explains how we comply with the applicable data protection laws, what your rights are and that for the purposes of data protection, we will be the controller of any of your personal information.

In this privacy notice, references to **we**, **our** or **us** are to the members of the Committee of WBHC (the “**Committee**”). We are a “**controller**” of your personal data. This is a legal term – it means that we make decisions about how and why we process your personal data and, because of this, we are responsible for making sure it is used in accordance with data protection laws. You should read this notice, so that you know what we are doing with your personal data. Please also read any other privacy notices that we give you, that might apply to our use of your personal data in specific circumstances in the future. We are not required by law to appoint a Data Protection Officer. The Committee is accountable for overseeing our compliance with the applicable data protection laws and shall be assisted by WBHC’s Compliance Officer, who’s contact details are listed in Section 14 below.

#### **2. The Club’s data protection responsibilities**

“**Personal data**” is any information that relates to an identifiable natural person. Your name, address, contact details, salary details and CV are all examples of your personal data, if they identify you.

The term “**process**” means any activity relating to personal data, including, by way of example, collection, storage, use, consultation and transmission.

WBHC is a “**controller**” of your personal data. This is a legal term – it means that we make decisions about how and why we process your personal data and, because of this, we are responsible for making sure it is used in accordance with data protection laws.

You also have responsibilities whenever you process personal data in connection with the performance of your role at WBHC; these are outlined in the “[West Bridgford Hockey Club - Data Protection Policy](#)”.

#### **3. Personal Data we may collect from you**

We collect many different types of personal data about you for lots of reasons. We cannot administer your membership with us without your personal data. Where we don’t need your personal data, we will make this clear, for instance we will explain if any data fields in our application processes are optional and can be left blank.

As part of registering for a membership with WBHC, you may provide us with, or we may subsequently obtain, personal data about you or your child, such as:

##### Contact Information

- Name(s)
- Title
- Address(es)
- Email address(es)
- Contact details including any telephone number(s)

##### Personal Information

- Date of birth
- Gender
- Next of kin or other family members and/or dependants
- Marital or relationship status
- Emergency contact information

#### Financial Information

- Any credit/debit card and other payment details you provide so that we can receive payments from you and details of the financial transactions with you.

#### Identity and Background Information

- Membership start and end date
- Records of your attendance at any events hosted by us, including training sessions and WBHC social events
- Images in video and/or photographic form and voice recordings
- Details of any other relevant membership, e.g., where you represent a county or national side
- Details of any umpiring or coaching qualifications

#### Preferences, Platform Usage and Communications Information

- Information about your general preferences and any other information you share when you respond to any surveys
- Use of and movements through our online portal, passwords, personal identification numbers, IP addresses, user names and other IT system identifying information
- Your marketing preferences, so that we know whether and how we should contact you
- Records of your interactions with us such as telephone conversations, emails and other any other correspondence with us

#### Hockey Information

- Any disciplinary action taken against you
- Any complaints raised by you
- Records and assessment of any player rankings, grading or ratings, competition results, details regarding events/matches/games attended and performance (including 'man of the match' nominations)

If any of the personal information you have given to us changes, such as your contact details, please inform us without delay by contacting.

#### 4. **Special Categories of Personal Data**

We are required by law to treat certain categories of personal data with even more care than usual. These are called sensitive or “**special categories**” of personal data and different lawful bases apply to them. We may also collect, store and use the following special categories of more sensitive personal data regarding you:

- information about your race or ethnicity, religious beliefs and sexual orientation;
- information about your health, including any medical condition, health and sickness records, medical records and health professional information; and
- information regarding accidents and injuries.

We may not collect all of the above types of special category personal information about you but in relation to the special category personal data that we do process, we do so on the basis that:

- you have given your explicit consent;
- the processing is necessary for reasons of substantial public interest, on a lawful basis;

- it is necessary for the establishment, exercise or defence of legal claims; or
- it is necessary for the purposes of carrying out the obligations and exercising our or your rights in the field of employment and social security and social protection law.

In the table below we refer to these as the “special category reasons for processing of your personal data”.

We may also collect criminal records information about you. For criminal records history we process it on the basis of legal obligations or based on your explicit consent.

## 5. **Where we collect your information**

We typically collect personal information about our members:

- directly from you;
- when you apply to become a member of WBHC via the Teamo service;
- when you purchase any services or products we offer; and/or
- when you make a query and/or complaint or when you correspond with us by phone, e-mail or in some other way (noting that communication channels not formally endorsed by the Club such as informal chat groups hosted on services, such as WhatsApp, by members and/or other parties are not the responsibility of the Club but instead, the administrator of that service).

If you are providing us with details of next of kin, beneficiaries, family members and emergency contacts they have a right to know and to be aware of how what personal information we hold about them, how we collect it and how we use and may share that information. Please share this privacy notice with those of them whom you feel are sufficiently mature to understand it. They also have the same rights as set out in the “**Your rights in relation to personal information**” section below.

## 6. **What do we do with your Personal Data, and why?**

We process your personal data for particular purposes in connection with your employment or engagement with us, and the management and administration of our business.

We are required by law to always have a permitted reason or justification (called a “lawful basis”) for processing your personal data. There are six such permitted lawful basis for processing personal data, the most relevant to the Club are set out below.

The table below describes the main purposes for which we process your personal data, the categories of your information involved and our lawful basis for being able to do this.

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## Purposes of processing personal data

*For some processing activities, we consider that more than one lawful basis may be relevant – depending on the circumstances.*

Purposes of processing	<b>Lawful basis</b> We are permitted to process your personal data because...			
	<b>1.</b> You have given <b>your consent</b> to the processing (Please also see <b>paragraph 12</b> )	<b>2.</b> It is necessary for us to comply with a legal obligation	<b>3.</b> It is necessary for our legitimate interests or those of third parties <sup>1</sup>	<b>4.</b> It is necessary to protect your vital interests (or those of someone else)
Administering your application for membership with us and considering your suitability for the membership or participation in the Committee			✓	
Administering any payments by you to the Club, including (but not limited to) membership fees, or coaching camps	✓		✓	
Registering you as a player on England Hockey's systems, e.g. GMS (or any similar replacement)			✓	
Fully completing the Team and Match Sheet data on GMS (or any similar replacement)			✓	
Communicating with you and providing you with information in connection with your membership or engagement with us from time to time			✓	
Arranging and managing any contracts with third parties for the provision of any services relevant to your membership			✓	
Sending you information as part of your membership benefits package, including: details about advanced event / membership information, competitions and events, partner offers and discounts, and updates relating to the Club.	✓			

<sup>1</sup> Article 13(1)(d) of the GDPR states that where the controller's processing is based on Article 6(1)(f) (i.e. necessary for legitimate interests of the controller or a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject) requires the controller to provide the legitimate interests pursued by them in their Fair Processing Notice or equivalent, such as this document. This Club Member Notice sets out illustrative processing activities and purposes as examples – these should be tailored, as required, to accurately describe the controller's or a third party's legitimate interests.

<b>Sending you marketing information which you have requested or that we think you might find useful, including: WBHC newsletters, information about memberships, events, products and information about our commercial partners</b>	✓			
<b>Answering your queries and/or complaints</b>			✓	
<b>Ensuring the security of our IT systems</b>			✓	
<b>Conduct data analytics studies to better understand event attendance and trends</b>	✓		✓	
<b>Promoting the club on social media platforms, e.g. allowing your photograph to be taken for weekly man of the match bulletins</b>	✓			
<b>Managing our health and safety and/or safeguarding requirements (Note: special category personal data in paragraph 4)</b>		✓		
<b>Administering your attendance at any development courses you sign up to</b>			✓	
<b>Arranging any transportation, accommodation or other related arrangements in respect of a fixture or tour.</b>			✓	
<b>Contacting the appropriate person in the event of an emergency concerning you (Note: special category personal data paragraph 4)</b>				✓
<b>Using information about your physical or mental health (including any injuries) and/or disability status, to evaluate participation in any events or activities we host and allow us to provide appropriate adjustments to our sports facilities (Note: special category personal data in paragraph 4)</b>	✓	✓		
<b>Gathering evidence for possible grievance or disciplinary hearings (Note: special category personal data in paragraph 4)</b>			✓	✓
<b>Complying with legal obligations regarding working with children or vulnerable adults (Note: special category personal data in paragraph 4) including undertaking DBS checks where relevant.</b>	✓	✓		

For some of your personal information you will have a legal, contractual or other requirement or obligation for you to provide us with your personal information. If you do not provide us with the requested personal information we may not be able to admit you as a member or we may not be able to properly perform our contract with you or comply with legal obligations and we may have to terminate your membership. For

other personal information you may not be under an obligation to provide it to us, but if you do not provide it then we may not be able to properly perform our contract with you.

Where you have given us your consent to use your personal information in a particular manner, you have the right to withdraw this consent at any time, which you may do by contacting us as described in the "Contacting us" section below.

Please note however that the withdrawal of your consent will not affect any use of the data made before you withdrew your consent and we may still be entitled to hold and process the relevant personal information to the extent that we are entitled to do so on bases other than your consent. Withdrawing consent may also have the same effects as not providing the information in the first place, for example we may no longer be able to provide certain member benefits to you.

#### Purposes of processing special category personal data

Purposes of processing	<b>Lawful basis</b> We are permitted to process your personal data because...				
	1. You have given <b>your explicit consent</b> to the processing	2. It is necessary for your/our obligations and rights in the field of employment and social security and social protection law	3. It is necessary to protect the vital interests of the data subject or another person you or they are physically or legally incapable of giving consent	4. It is necessary for our establishment, exercise or defence of legal claims	5. It is necessary for reasons of substantial public interest
Conducting verification and vetting, including criminal background checks and credit checks where required by law		✓			✓
Conducting background checks, verification and vetting which are not required by law but needed by us to assess your suitability for your role	✓				✓
Contacting the appropriate person in the event of an emergency concerning you			✓		
Responding to binding requests or search warrants or orders from courts, governmental, regulatory and/or enforcement bodies and authorities or sharing information (on a voluntary basis) with the same				✓	

Complying with disclosure orders arising in civil proceedings				✓	
Investigating, evaluating, demonstrating, monitoring, improving and reporting on WBHC's compliance with relevant legal and regulatory requirements				✓	
Making reasonable adjustments as needed to help remove barriers faced by you as a member because of any disability you might have		✓			
Supporting our diversity programmes and member support networks and initiatives	✓				

## 7. **Direct Marketing**

**Email, post and SMS marketing:** from time to time, we may contact you by email, post or SMS with information about products and services we believe you may be interested in.

We will only send marketing messages to you in accordance with your marketing preferences . You can then let us know at any time that you do not wish to receive marketing messages by contacting us using the following form: [WBHC Contact Form](#).

## 8. **Disclosure of your personal information**

Sometimes we need to disclose your personal data to other people. From time to time, we may share personal information with the following parties:

- **Any party approved by you.**
- **To any governing bodies or regional bodies for the sports covered by our club:** to allow them to properly administer the sports on a local, regional and national level.
- **Other hockey clubs?**
- **Other service providers:** for example, Temo, legal advisors, financial advisors payment processors, contractors or suppliers;
- **Our Commercial Partners:** for the purposes of providing you with information on any tickets, special offers, opportunities, products and services and other commercial benefits provided by our commercial partners;
- **The Government or our regulators:** where we are required to do so 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.

## 9. **Transferring your personal information internationally**

If any of our processing activities require your personal data to be transferred outside the European Economic Area, we will only make that transfer if:

- the country to which the personal data is to be transferred ensures an adequate level of protection for personal data;
- we have put in place appropriate safeguards to protect your personal data, such as an appropriate contract with the recipient. (Please submit a request if you wish to obtain a copy of these by using the following form: [WBHC Contact Form](#));
- the transfer is necessary for one of the reasons specified in data protection legislation, such as the performance of a contract between us and you; or
- you explicitly consent to the transfer.

#### 10. **How do we keep your Personal Data secure?**

We will take specific steps (as required by applicable data protection laws) to protect your personal data from unlawful or unauthorised processing and accidental loss, destruction or damage. For more information, please read the [“West Bridgford Hockey Club - Data Protection Policy”](#).

#### 11. **How long do we keep personal information for?**

The duration for which we retain your personal information will differ depending on the type of information and the reason why we collected it from you. However, in some cases personal information may be retained on a long-term basis - for example, personal information that we need to retain for legal purposes will normally be retained in accordance with usual commercial practice and regulatory requirements.

Generally, where there is no legal requirement, we retain all physical and electronic records for a period of 3 years after your last contact with us or the end of your membership. Exceptions to this rule are:

- Details regarding unsuccessful membership applicants where we hold records for a period of not more than 12 months; and
- Information that may be relevant to personal injury or discrimination claims may be retained until the limitation period for those types of claims has expired. For personal injury or discrimination claims this can be an extended period as the limitation period might not start to run until a long time after the event.

It is important to ensure that the personal information we hold about you is accurate and up-to-date, and you should let us know if anything changes, for example if you change your phone number or email address. You may be able to update some of the personal information we hold about you through online services. Alternatively, you can contact us by using the details set out in the **"Contacting us"** section below.

#### 12. **Your rights in relation to personal information**

You have certain legal rights, which are briefly in the table below, in relation to any personal data about you which we hold:

<b><i>Your right</i></b>	<b><i>What does it mean?</i></b>	<b><i>Limitations and conditions of your right</i></b>
<b><i>Right of access</i></b>	Subject to certain conditions, you are entitled to have access to your personal data (this is more commonly known as submitting a “data subject access request”).	<p>If possible, you should specify the type of information you would like to see to ensure that our disclosure is meeting your expectations.</p> <p>We must be able to verify your identity. Your request may not impact the rights and freedoms of other people, eg privacy and confidentiality rights of other staff.</p>



<b><i>Right to data portability</i></b>	Subject to certain conditions, you are entitled to receive the personal data which you have provided to us and which is processed by us by automated means, in a structured, commonly-used machine readable format.	<p>If you exercise this right, you should specify the type of information you would like to receive (and where we should send it) where possible to ensure that our disclosure is meeting your expectations.</p> <p>This right only applies if the processing is based on your consent or on our contract with you and when the processing is carried out by automated means (i.e. not for paper records). It covers only the personal data that has been provided to us by you.</p>
<b><i>Rights in relation to inaccurate personal or incomplete data</i></b>	<p>You may challenge the accuracy or completeness of your personal data and have it corrected or completed, as applicable. You have a responsibility to help us to keep your personal information accurate and up to date.</p> <p>We encourage you to notify us of any changes regarding your personal data as soon as they occur, including changes to your contact details, telephone number, immigration status.</p>	<p>Please always check first whether there are any available self-help tools to correct the personal data we process about you.</p> <p>This right only applies to your own personal data. When exercising this right, please be as specific as possible.</p>
<b><i>Right to object to or restrict our data processing</i></b>	Subject to certain conditions, you have the right to object to or ask us to restrict the processing of your personal data.	As stated above, this right applies where our processing of your personal data is necessary for our legitimate interests. You can also object to our processing of your personal data for direct marketing purposes.
<b><i>Right to erasure</i></b>	Subject to certain conditions, you are entitled to have your personal data erased (also known as the “right to be forgotten”), eg where your personal data is no longer needed for the purposes it was collected for, or where the relevant processing is unlawful.	We may not be in a position to erase your personal data, if for example, we need it to (i) comply with a legal obligation, or (ii) exercise or defend legal claims.
<b><i>Right to withdrawal of consent</i></b>	As stated above, where our processing of your personal data is based on your consent you have the right to withdraw your consent at any time.	If you withdraw your consent, this will only take effect for future processing.

Where our processing of your personal data is based on your **consent**, you have the right to withdraw your consent at any time. If you do decide to withdraw your consent we will stop processing your personal data for that purpose, unless there is another lawful basis we can rely on – in which case, we will let you know. Your withdrawal of your consent won’t impact any of our processing up to that point.

Where our processing of your personal data is necessary for our **legitimate interests**, you can object to this processing at any time. If you do this, we will need to show either a compelling reason why our processing should continue, which overrides your interests, rights and freedoms or that the processing is necessary for us to establish, exercise or defend a legal claim.

If you wish to exercise any of your rights please submit a request by using the following form: [WBHC Contact Form](#) in the first instance.

You also have the right to lodge a complaint with the Information Commissioner's Office, which is the UK data protection regulator. More information can be found on the Information Commissioner's Office website at <https://ico.org.uk/>.

#### 13. **Changes to this notice**

We may update this privacy notice from time to time. When we change this notice in a material way, we will make a club-wide announcement, via the Teamo app. We will also update the version date at the bottom of this page and so we encourage you to check this notice on a regular basis.

#### 14. **Contacting us**

To assist the Committee in overseeing our compliance with data protection laws, we have appointed a Compliance Officer. The Club's Compliance Officer should be your first point of contact if you have any queries or concerns about your personal data.

If you want more information about any of the subjects covered in this privacy notice or if you would like to discuss any issues or concerns with us, you can submit a request by using the following form: [WBHC Contact Form](#).

**Version dated: April 2024**