

WINCHESTER AND DISTRICT BADMINTON ASSOCIATION DATA PROTECTION POLICY

1. Introduction

- 1.1 Winchester and District Badminton Association ("the Association") exists to run badminton League Competitions and Tournaments and to promote the interests of badminton in the Winchester and District area. The Association is comprised of its member clubs and both the Association and all its member clubs are required to affiliate to Badminton England. Officers of the Association are all volunteers. To provide our services, we are required to collect, process, use and retain certain personal data for a variety of purposes.
- 1.2 The personal data we process relates to players and volunteer officials from both our member clubs and the Association.
- 1.3 This data protection policy ("the **Policy**") applies to anyone processing personal data, on behalf of the Association.

2. About the Policy

- 2.1 This Policy and any other documents referred to in it sets out the basis on which we will process any personal data we collect from data subjects, or that is provided to us by data subjects or other sources.
- 2.2 The Honorary Association Secretary is responsible for ensuring compliance with applicable Data Protection Laws and with this Policy. Any questions about the operation of this Policy or any concerns that the Policy has not been followed should be referred in the first instance to the Honorary Association Secretary.

3. Definitions of Data Protection Terms

"data controller" means the organisation that determines the purposes and means of the processing of personal data. We are the data controller of all personal data used in our Association for our own administrative purposes.

"data breach" or **"breach"** means a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data transmitted, stored or otherwise processed.

"data processor" means an organisation or individual which processes personal data on behalf of the Association.

"data subjects" for the purpose of this Policy means all living individuals about whom the Association holds personal data. A data subject need not be a UK national or resident. All data subjects have legal rights in relation to their personal data.

"personal data" means any information relating to an identified or identifiable natural person; an identifiable person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number (e.g. NI number), location data, online identifier (IP address) or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that person.

"processing" means any operation or set of operations performed upon personal data or sets of personal data, whether or not by automated means, such as collection, recording,

organisation, structuring, storage, retrieval, use, disclosure by transmission, dissemination or otherwise making available, erasure or destruction.

"sensitive personal data" are personal data, revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade-union membership; data concerning health or sex life and sexual orientation; genetic data or biometric data (e.g. DNA, finger prints etc.).

"the consent of the data subject" means any freely given, specific, informed and unambiguous indication of his or her wishes by which the data subject, either by a statement or by a clear affirmative action, signifies agreement to personal data relating to them being processed.

4. Scope and Objectives of Policy

4.1 The Policy applies to personal data in all its forms whether on paper or stored electronically. It applies throughout the lifecycle of the information from creation through storage and utilisation to disposal.

4.2 The Policy will ensure that the Association:

4.2.1 Complies with applicable Data Protection Laws and follows good practice;

4.2.2 Protects the rights of those playing in the Association's competitions;

4.2.3 Is transparent about how it stores and processes personal data; and

4.2.4 Protects itself from the risks of a data breach or other unlawful processing of personal data.

5. Data Protection Laws

5.1 The Data Protection Laws describe how we must collect, handle and store personal data and these rules apply regardless of whether data is stored electronically or in paper format.

5.2 Anyone processing personal data must comply with the enforceable principles of good practice. These include, but are not limited to, that personal data must:

5.2.1 Be processed fairly and lawfully (lawfulness, fairness and transparency);

5.2.2 Be collected only for specific and lawful purposes and not processed in a manner that is incompatible with those purposes (purpose limitation);

5.2.3 Be adequate, relevant and limited to what is necessary for the purposes it is collected (data minimisation);

5.2.4 Be accurate and kept up to date (accuracy);

5.2.5 Not be held for longer than is necessary for the purposes it is collected (storage limitation);

5.2.6 Be processed in accordance with the data subject's rights;

5.2.7 Be processed in a manner that ensures appropriate security (integrity and confidentiality); and

5.2.8 Not be transferred to a country or a territory outside the European Economic Area ("EEA") unless that country or territory ensures an adequate level of protection.

6. Fair and Lawful Processing

6.1 Data Protection Laws are not intended to prevent the processing of personal data, but to ensure that it is done fairly and without adversely affecting the rights of the data subject.

6.2 For personal data to be processed lawfully, they must be processed on the basis of one of the legal grounds set out under applicable Data Protection Laws. These include, among other things, the data subject's consent to the processing, for the compliance with a legal obligation to which the data controller is subject, or for the legitimate interest of the data controller or the party to whom the data is disclosed. When sensitive personal data is being processed, additional conditions must be met.

6.3 Our privacy notice explains the legal basis on which we process personal data; this is available on request and on our website.

7. Processing for Limited Purposes

7.1 We will only process personal data for specified, explicit and legitimate purposes, or for any other purposes specifically permitted by applicable Data Protection Laws. We will not undertake further processing in any manner incompatible with those purposes, and will not use it for new, different or incompatible purposes from that disclosed when it was first obtained, unless you have informed the data subject of the new purposes, and they have consented (if necessary).

7.2 We will notify those purposes to the data subject when we first collect the data or as soon as possible thereafter, and such purposes may include (amongst others):

7.2.1 Running badminton League and Tournament competitions in the Winchester and District area.

7.2.2 Promoting the interests of badminton in the Winchester and District area.

7.2.3 Compliance with any legal obligations.

8. Providing information

8.1 In the course of our operations, we may collect and process personal data. This will mainly be data we receive from other sources (for example, clubs providing us with membership details for registration purposes) but may also include data we receive directly from a data subject (for example, if a club member contacts us directly).

8.2 To assist with our compliance of the above requirements, we have a privacy statement setting out how we use personal data relating to data subjects.

9. Adequate, Relevant and Non-Excessive Processing

9.1 We will only collect personal data to the extent that it is required for the specific purpose notified to the data subject.

10. Data Accuracy

10.1 If we receive a request to update or correct any personal data we hold, and provided we have authenticated the identity of the data subject in question, we will take all reasonable steps to ensure that personal data we hold is accurate and kept up to date. We will take all reasonable steps to destroy or amend inaccurate or out-of-date data.

11. Data Retention

We will not keep personal data longer than is necessary for the purpose or purposes for which they were collected.

12. Data Security

12.1 We will take appropriate security measures against unlawful or unauthorised processing of personal data, and against the accidental loss of, or damage to, personal data.

12.2 We will only use data processors that agree to comply with these procedures and policies, or if it puts in place adequate measures itself.

13. Data Storage

13.1 Personal data will be stored electronically and in paper format.

14. Changes to this Policy

We reserve the right to change this Policy at any time. Where appropriate, we will notify you of those changes by mail or email.

15. Questions

Please refer questions to the [Honorary Association Secretary](#).