



## Data Protection/Privacy Policy and Notice

### Introduction

The General Data Protection Regulation (GDPR) will apply in the UK from 25 May 2018, replacing Data Protection Act 1998. GDPR applies to personal data. Put simply, personal data is any information which relates to a living person. Most obviously, this can be an individual's name, but it could be their address, email address, medical history or sporting history. It can be held in a large number of places, such as the Rugby Football Union (RFU)'s Game Management System (GMS), Club spreadsheets, Club Committee minutes, disciplinary judgments, member application forms, employment related information, and many more. Personal data may be held at the Club premises, or on individual members' own equipment at their homes.

This Data Protection Policy sets out Farnborough Rugby Union Football Club Limited's commitment to protecting personal data and how that commitment is implemented with regard to the collection, processing and use of personal data, in line with meeting requirements of, including the Club's legal obligations as laid down by, the the GDPR. This applies to personal data held on paper and held electronically.

The Club is committed to ensuring that personal data shall be:

- collected, processed and used lawfully, fairly and in a transparent manner in relation to individuals,
- collected, processed and used for specified, explicit and legitimate purposes to meet the Club's operational needs and fulfil its legal requirements, and not further processed in a manner that is incompatible with those purposes,
- adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed,
- accurate and, where necessary, kept up to date - with every reasonable step taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay,
- established with appropriate retention periods, being kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed and used. (In certain circumstances personal data may be stored for longer periods subject to implementation of the appropriate security measures required by the GDPR in order to safeguard the rights and freedoms of individuals (also see next bullet).),
- processed and stored in a manner that ensures appropriate security of the personal data, with defined organisational, physical, procedural and technical security measures implemented and maintained to protect against unauthorised disclosure, unauthorised modification, unauthorised unavailability and destruction, and unlawful processing – and against accidental loss, destruction or damage.

The Club is also committed to:

- ensuring that data subjects' rights can be appropriately exercised,
- ensuring that a nominated Club Data Protection Officer is responsible for data protection compliance and provides a point of contact for all data protection issues,



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- ensuring that all Club officers are aware of good practice in data protection,
- providing adequate training for those people responsible for personal data,
- ensuring that everyone handling personal data knows where to find further guidance,
- ensuring that queries about data protection, internal and external to the Club, are dealt with effectively and promptly,
- regularly reviewing data protection procedures and guidelines within the Club.

### Summary of How the Club and the RFU use and share your Data

- The Club uses your personal data to manage and administer your membership and your involvement with its teams and the Club, and to keep in contact with you for these purposes.
- Other personal data handled by the Club could be that included in agreements/contracts for hire of the Club, that used for the employment and payments to bar staff, and that used for the payment to self-employed contractors (e.g. for physio support, for cleaning of the Club).
- Some data is shared with the RFU, who use your data to regulate, develop and manage the game.
- Some data is also shared with Hampshire RFU, but no-one else in normal circumstances (see bullet below).
- Personal data may have to be shared with government authorities and/or law enforcement officials if mandated by law or if required for the legal protection of our or the RFU's legitimate interests in compliance with applicable laws.
- Amongst the data the Club collects from you may be medical (including injury) information. The Club will hold this where you (or your parent) have given consent, so that the Club can ensure it is aware of your condition and can that you are supported appropriately.
- Where you work in a particular role within the game, you may be required to undergo a Disclosure & Barring Service check using the RFU's eDBS system. The result of this check will be input into your Game Management Service (GMS) record.

### What does this Policy and Notice Cover?

This policy and notice describes:

- What personal data the Club collects and makes use of in relation to its members and players, paid staff, self-employed contractors, and in some cases unpaid volunteers, including the Club's use of the RFU's GMS.
- What information the Club receives from third parties.





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- How the Club uses your personal data, and what the legal basis is for this use.
- How the RFU uses your personal data on GMS.
- The rights you have.
- How you get in touch with the Club or the RFU.
- How long the Club and the RFU will retain your personal data.
- The security in place to protect your personal data.

### **What Information does the Club Collect and Use?**

The Club collects and processes personal data from you and/or your parent when you join and when we carry out annual renewals of your membership, and the Club may receive information about you/them from their previous club, such as when a Player Transfer request occurs.

The Club also collects and processes personal data relating to those the Club employs to work at, or otherwise engage to work at/for, the Club, in both a paid or voluntary capacity. This includes for employment purposes, to assist in the running of the Club and/or to enable individuals to be paid.

The personal data which you supply to the Club may be used in a number of ways as shown below (where the data types collected and processed are shown in brackets):

On Paper, to complete/complete action on the:

- M&Js Registration Checklist (Name, Age Group)
- M&Js Registration Form (Names (Player and Parents), Address, Date of Birth, Age Group, 'Phone Numbers, E-mail Addresses, Schools/Rugby Clubs Attended, Passport Photo of Child, Emergency Contact Name and Number)
- M&Js Medical Declaration (Players Name, Details of Medical Issues, Parents Signature)
- M&Js RFU Young Player Registration Form (Name, address, 'Phone Numbers, E-mail Address, Ethnic Origin, Schools/Rugby Clubs)
- M&Js Standing Order Mandate Form (Name, Bank Account Details, Address)
- M&Js Photo Card of Player (Photo, Name, Medical Information, Emergency Contact Name and 'Phone Number)
- M&Js DBS Checklist (Name, Address, 'Phone Number, E-mail Address, Passport Number, Driving License Number (once the info from the form has been inputted the form is then shredded).)
- Adult Players Registration Form (Full Name of the player, Full Address with Postcode, Place of Birth and Country of Origin, Date of Birth, 'Phone numbers, E-mail addresses,



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Previous rugby clubs attended, Nationality, Medical Information, RFU GMS Registration ID number)

- Adult (Playing and Non-Playing) Membership Form (surname, forename(s), address, occupation, date of birth, home phone number, business phone number, mobile number, e-Mail Address, category of membership, signature of applicant, date - and for new membership (as opposed to renew membership) plus – name and signature of seconding Club member)
- Adult Member Standing Order Form (name of bank, bank address, instructions (monthly amount to be agreed with the relevant Membership Secretary), name of account to be debited, sort code, account number, account holder signature, name (and stating Mr/Mrs/Miss or other title), address, post code, date)
- Paid Staff Form [HMRC starter checklist form for new bar staff (and any other paid personnel if any)] (last name, first name(s), home address, indicate male or female, date of birth, national insurance number, employment start date, employee statement (first job since last 6th April etc/now only job but since last 6th April had another job, etc/as well as new job have another job or pension etc), yes/no have student loan, if yes paying student loan to Student Loans Company, student loan plan (1 or 2), finished studies before last 6th April, signature - plus name again, date of signature)
- HMRC Letters re paid staff tax code changes & notifications of Student loan repayment activation for action re pay ((1) PAYE reference, name, NI number, payroll number, new tax code, year applies to. (2) Name, NI number, payroll number, start date re student loan deduction, Student loan plan type)
- Payment Advice Sheets for paid staff (name, tax code, NI number, gross, tax, and net payments for month, etc)
- Paid Staff Timesheets (name, hours worked, what paid in month)
- Bar Manager staff payment record book (name, amount paid, date of payment)
- Club contact details for entry on Club website (name, e-mail address, phone number(s))

In electronic form, using the information supplied on paper to update the:

- M&Js Player Database (Name (player and parents), Address, Date of Birth, Age Group, 'Phone Numbers, E-mail Addresses, School/Rugby Clubs attended, Passport Photo of Child, Emergency Contact Name and Number)
- M&Js Children at Work Database (Expiry of DBS, First Aid Certificate, Courses that the Coach has taken)
- Adult Player Database (Full Name of the Player, Full Address with Postcode, Place of Birth and Country of Origin, Date of Birth, 'Phone Numbers, E-mail Addresses, Previous rugby clubs attended, Nationality, Medical Information, RFU GMS Registration number)
- Adult (Playing and Non-Playing) Membership Register (surname, forename(s), address, occupation, date of birth, home phone number, business phone number, mobile number, e-mail address, category of membership, membership number, annual subscription fee, date paid)





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- File of copies of completed Adult Member Standing Order Forms (name of bank, bank address, instructions (monthly amount to be agreed with the relevant Membership Secretary), name of account to be debited, sort code, account number, account holder signature, name (and stating Mr/Mrs/Miss or other title), address, post code, date)
- Paid Staff Form file [HMRC starter checklist form for new bar staff (and any other paid personnel if any)] (last name, first name(s), home address, indicate male or female, date of birth, national insurance number, employment start date, employee statement (first job since last 6th April etc/now only job but since last 6th April had another job, etc/as well as new job have another job or pension etc), yes/no have student loan, if yes paying student loan to Student Loans Company, student loan plan (1 or 2), finished studies before last 6th April, signature - plus name again, date of signature)
- File of copies of HMRC Letters re paid staff tax code changes & notifications of Student loan repayment activation for action re pay ((1) PAYE reference, name, NI number, payroll number, new tax code, year applies to. (2) Name, NI number, payroll number, start date re student loan deduction, Student loan plan type)
- File of copies of Paid Staff Timesheets (name, hours worked, what paid in month)
- Payment Advice Sheets file (name, tax code, NI number, gross, tax, and net payments for month, etc)
- Club website contact details section (name, e-mail address, phone number(s))

Please note that when your personal data is collected by the Club, you must specifically indicate your consent on each form you complete for the Club collecting, holding and processing your personal data. The place to do this will be clear on each form. Note that only those 13 years old or over can give consent – for those under 13, you will need parental consent.

Regarding our membership forms, the Club asks you to fill in these forms so that it can input and hold the contact information you give us on our secure electronic registers (databases), and on the Club's secure 'page' on the RFU's GMS. The Club holds this personal data and use/share this information to:

- keep in contact with you,
- ensure you/your child is playing in the correct age grade and is registered to play with our governing body, the RFU,
- ensure the Club knows about any relevant medical conditions which would affect your well-being when you participate in our sport. The Club only shares this information with the relevant Team Manager/Coaching Team of your particular age grade or group, and the Club asks for consent to do this.
- ensure the Club has emergency contact details for you in case of any accident or incident
- ensure the Club has your consent to take photographic images and videos for the purposes of such activities as match analysis and celebratory achievements. The Club will never identify any children under the age of 18 in such images.

Some information will be generated as part of your involvement with the Club, in particular data about your performance, involvement in particular matches in match reports and details



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of any disciplinary issues or incidents you may be involved in on and off the pitch, such as within health and safety records.

As already mentioned, the Club only shares your information external to the Club with the RFU, including keeping the Club's entries on the RFU's GMS up-to-date, and Hampshire RFU. The Club will not disclose any information to any other organisation unless required to do by law. For further information on how your information is used, how the Club maintains the security of your information, and your rights to access information the Club holds on you, please contact the Club's Data Protection Officer, [name, e-mail address and 'phone numbers to be confirmed; before then contact Robin Moses (Club President) or Chris Collett (Chairman Minis & Juniors section – contact details on the Club website].

### What Information does the Club receive from Third Parties?

Sometimes, the Club receives information about you from third parties. For example, if you are a child, we may be given information about you by your parents.

We may receive information relating to your existing registrations with other clubs or rugby bodies or disciplinary history from the RFU through GMS. Additionally, for certain role holders or those working with children, we may receive information from the Disclosure and Barring Service and RFU on the status of any DBS check you have been required to take.

### How does the Club use this Personal Data, and What is the Legal Basis for this use?

The Club processes personal data for the following purposes:

- As required by the Club to conduct its business and pursue its legitimate interests, in particular the Club (1) will use your information to manage and administer your membership and your involvement with its teams and the Club, and to keep in contact with you for these purposes, and (2) will also use data to maintain records of performances and history, including match reports, score lines and team sheets.
- To fulfil a contract, or take steps linked to a contract. This is relevant where you make a payment for your membership and any merchandise, or maybe enter a competition. This includes taking payments, communicating with you, providing and arranging the delivery or other provision of products, awards, prizes, etc. It is also relevant to paid staff and self-employed contractors.
- The Club may handle medical or disability information you or your parent provides to us, to ensure we support you appropriately.
- For purposes which are required by law:
  - The Club maintains records such as health and safety records and accounting records in order to meet specific legal requirements.
  - The Club ensures, where you will work with children, that you have undergone an appropriate DBS check – this is carried out with your consent.
  - Where you hold a role at the Club, requiring the Club to check your right to work – the Club may process information to meet our statutory duties.





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- The Club may respond to requests by government or law enforcement authorities conducting an investigation.

### How does the RFU use my Personal Data?

The RFU provides GMS, and makes its own use of the following personal data:

- your name,
- your gender,
- your date of birth,
- your RFU ID (as assigned in GMS),
- your home address, email address and phone number,
- your type of membership and involvement in particular teams at the Club, or any key role you may have been allocated, such as Chairman, Safeguarding Lead, Membership Secretary etc.

The RFU uses this information as follows:

- As required by the RFU to conduct its business and pursue its legitimate interests, in particular:
  - communicating with you or about you where necessary to administer Rugby in England, including responding to any questions you send to the RFU about GMS,
  - administering and ensuring the eligibility of players, match officials and others involved in English rugby – this may involve the receipt of limited amounts of sensitive data in relation to disabled players, where they are registered for a disabled league or team, or in relation to anti-doping matters,
  - maintaining records of the game as played in England, in particular maintaining details of discipline and misconduct,
  - monitoring use of GMS, and using this to help it monitor, improve and protect its content and services and investigate any complaints received from you or from others about GMS,
  - maintaining statistics and conducting analysis on the make-up of rugby's participants,
  - ensuring compliance with the current RFU Rules and Regulations including those on the affiliation of clubs, referee societies, constituent bodies and other rugby bodies, and registration of players,
  - communicating with you to ask for your opinion on RFU initiatives.
- For purposes which are required by law:
  - The RFU will ensure, where you will work with children and where this is required, that you have undergone an appropriate DBS check – this is carried out with your consent,



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- The RFU may respond to requests by government or law enforcement authorities conducting an investigation.

### What rights do I have?

You have the right to ask the Club for a copy of your personal data, to correct, delete or restrict (stop any active) processing of your personal data. You can also request a specific set or piece of information, or information about how your data has been used and shared. (Note that organisations are no longer able to charge a fee for this, and the information must be provided within 30 days.) A suggested process is shown at Appendix 1.

In addition, you can object to the processing of your personal data in some circumstances (in particular, where we don't have to process the data to meet a contractual or other legal requirement).

Rights may be limited, for example if fulfilling your request would reveal personal data about another person, or if you ask us to delete information which we are required by law to keep or have compelling legitimate interests in keeping.

You have the same rights for data held by the RFU for its own purposes on GMS.

To exercise any of these rights, you can get in touch with the Club – or, as appropriate, the RFU or its Data Protection Officer (see details below). If you have unresolved concerns, you have the right to complain to the Information Commissioner's Office (the UK's independent authority set up to uphold information rights in the public interest, promoting openness by public bodies and data privacy for individuals) – <https://ico.org.uk>.

Much of the information must be provided on the RFU's GMS on a mandatory basis so that the appropriate legal checks can be made and you can be registered as required by RFU Rules and Regulations. If you wish to know which information is mandatory please contact Richard 'Magic' Wond (Club Director of Rugby) for the senior side of the Club, Chris Collett for the Minis & Juniors section, or Tink Shaw for any safeguarding related aspects (contact details on the Club website). Some information is optional, particularly information such as your medical information. However, if this is not provided, the Club/the RFU may not be able to provide you with appropriate assistance, services or support.

### How do I get in touch with the Club or the RFU?

The Club hopes that it can satisfy queries you may have about the way the Club processes your data. If you have any concerns about how the Club processes your data, you can get in touch with the Club's Data Protection Officer [name, e-mail address and 'phone numbers to be confirmed; before then contact Robin Moses (Club President) or Chris Collett (Chairman Minis & Juniors section – contact details on the Club website)].

If you have any concerns about how the RFU process your data, you can get in touch at [legal@rfu.com](mailto:legal@rfu.com) or by writing to The Data Protection Officer, Rugby Football Union, Twickenham Stadium, 200 Whitton Road, Twickenham TW2 7BA.

### How long will the Club and the RFU retain my Data?

The Club processes the majority of your data for as long as you are an active member and for 3 years after this. Where the Club processes personal data in connection with performing a contract or for a competition, it keeps the data for 6 years from your last interaction with the Club. For other information, it will be appropriate only to keep data for a shorter period of time.





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For example, the Club will not need to keep bank details of former employees or self-employed contractors.

Please note that it is acceptable to retain members' details, for example, while they are members – it is not necessary to remove them and add the details afresh each year. Nevertheless, the Club will make regular checks, usually at the start of each season, to check whether it is still necessary to keep each individual's data.

The Club will retain information held to maintain statutory records in line with appropriate statutory requirements or guidance.

The RFU will maintain records of individuals who have registered on GMS, records of DBS checks and the resulting outcomes and other disciplinary matters for such period as is set out in the RFU's privacy notice to be set out on [www.englandrugby.com](http://www.englandrugby.com).

Records of your involvement in a particular match, on team sheets, on results pages or in match reports may be held indefinitely both by the Club and the RFU in order to maintain a record of the game.

### What Security must be in place to Protect my Personal Data?

#### Paper Documents

M&Js Registration Checklist, M&Js Registration Form, M&Js Medical Declaration, M&Js RFU Young Player Registration Form, M&Js Standing Order Mandate Form, M&Js Photo Card of Player, M&Js DBS Checklist: information stored in a lever arch file, locked in a cupboard in M&Js Membership Secretary, Team Managers/Coaches/First Aiders and Safeguarding Officer homes. Security to prevent unauthorised access - each Team Manager or Head Coach (team manager or coach then gives the information to First Aiders) is sent medical information - stored in a file kept in locked container/drawer/cupboard at homes. Information kept in locked drawer/cupboard/ container. Information kept in attended First Aid bag on match days. Random checks arranged by the Club Data Protection Officer will be made to see that the required security required is indeed being provided.

Adult Players Registration Form: kept in a file secured at the private address of, and only accessible to, the Director of Rugby (who is also 1<sup>st</sup> XV Manager and RFU GMS Database Officer). Random checks arranged by the Club Data Protection Officer will be made to see that the required security required is indeed being provided. RFU Adult Players registrations are sent/downloaded to the RFU GMS Database.

Adult (Playing and Non-Playing) Membership Form: kept in a lever arch file, locked in a cupboard in the Membership Secretary's home and only accessible to the Membership Secretary. Random checks arranged by the Club Data Protection Officer will be made to see that the required security required is indeed being provided.

Adult Member Standing Order Form: kept in a lever arch file, locked in a cupboard in the Membership Secretary's home and only accessible to the Membership Secretary (who sends originals to the Club Financial Director/Treasurer). Similar protection for Club Financial Director/Treasurer (who retains a copy and sends originals to banks). Random checks arranged by the Club Data Protection Officer will be made to see that the required security required is indeed being provided.

Paid Staff Form [HMRC starter checklist form for new bar staff (and any other paid personnel if any)]: kept in bar safe, then at Club Financial Director/ Treasurer's home securely stored until copies taken and originals sent to Accountant for payroll processing etc. Random checks



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arranged by the Club Data Protection Officer will be made to see that the required security required is indeed being provided.

HMRC Letters re paid staff tax code changes & notifications of Student loan repayment activation for action re pay: kept at Club Financial Director/ Treasurer's home securely stored until copies taken and originals sent to Accountant for payroll processing etc. Random checks arranged by the Club Data Protection Officer will be made to see that the required security required is indeed being provided.

Payment Advice Sheets: kept in bar safe plus secure storage at Club Financial Director/ Treasurer's home. Random checks arranged by the Club Data Protection Officer will be made to see that the required security required is indeed being provided.

Paid staff timesheets: kept in bar safe then secure storage at Club Financial Director/ Treasurer's home. Random checks arranged by the Club Data Protection Officer will be made to see that the required security required is indeed being provided.

Bar Manager staff payment record book: kept in bar safe/in secure storage at Bar Manager's home. Random checks arranged by the Club Data Protection Officer will be made to see that the required security required is indeed being provided.

Club contact details for entry on Club website: not really stored anywhere - each official gives his/her details to the webmaster by e-mail.

Note: when paper documents no longer required they must be destroyed by shredding (not just ripping up and putting them in the bin).

### Electronic Documents

M&Js Player Database and M&Js Children at Work Database: data stored on the laptops of, and accessible to, the Membership Secretary, Team Managers, Coaches, First Aiders and the Safeguarding Officer, with laptops stored at their homes. These laptops are connected to the Internet, and accessible to family members. **It is mandatory that these laptops MUST be user id and password protected, and also each document MUST be password protected (see \*\* note below).** Some of the data is sent to the RFU's GMS Database (which has its own access and other security controls). No personal information is shared on social media associated with the Club. Random checks arranged by the Club Data Protection Officer will be made to see that the required security required is indeed being provided.

Adult Player Database: data stored on a laptop secured at the private address of the Director of Rugby (who is also 1<sup>st</sup> XV Manager and RFU GMS Database Officer). The laptop is connected to the Internet, and only accessible to the Director of Rugby. **It is mandatory that this laptop MUST be user id and password protected, and also each document MUST be password protected (see \*\* note below).** Some of the data is sent to the RFU's GMS Database (which has its own access and other security controls), and ID required to gain access to the RFU GMS Database. Electronic info sent to RFU GMS Database. Only players names are shared on social media associated with the Club and all these pages are administered as closed private groups. All players on these pages have their own Facebook accounts and profiles to get permission and access to the closed groups once permission has been granted by the group administrator. Random checks arranged by the Club Data Protection Officer will be made to see that the required security required is indeed being provided.

Adult (Playing and Non-Playing) Membership Register: data stored on a laptop secured at the private address of the Membership Secretary. The laptop is connected to the Internet, and





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only accessible to the Membership Secretary. **It is mandatory that this laptop MUST be user id and password protected, and also each document MUST be password protected (see \*\* note below).** No personal information is shared on social media associated with the Club. Random checks arranged by the Club Data Protection Officer will be made to see that the required security required is indeed being provided.

File of copies of completed Adult Member Standing Order Forms: data stored on a laptop secured at the private address of the Club Financial Director/ Treasurer. The laptop is connected to the Internet, and only accessible to the Financial Director/Treasurer. (The Financial Director/Treasurer sends paper copies sent to the relevant banks.) **It is mandatory that this laptop MUST be user id and password protected, and also each document MUST be password protected (see \*\* note below).** No personal information is shared on social media associated with the Club. Random checks arranged by the Club Data Protection Officer will be made to see that the required security required is indeed being provided.

Paid Staff Form file (of scanned HMRC starter checklist forms for new bar staff, and any other paid personnel if any), and the file of scanned HMRC Letters re paid staff tax code changes & notifications of Student loan repayment activation for action re pay: data stored on a laptop secured at the private address of the Financial Director/ Treasurer. The laptop is connected to the Internet, and only accessible to the Financial Director/Treasurer. Electronic copies sent to the Club Accountant for payroll processing etc. **It is mandatory that this laptop MUST be user id and password protected, and also each document MUST be password protected (see \*\* note below).** No personal information is shared on social media associated with the Club. Random checks arranged by the Club Data Protection Officer will be made to see that the required security required is indeed being provided.

File of copies of Paid Staff Timesheets: data stored on a laptop secured at the private address of the Financial Director/ Treasurer. The laptop is connected to the Internet, and only accessible to the Financial Director/Treasurer. Electronic copies sent to the Club Accountant for payroll processing etc. **It is mandatory that this laptop MUST be user id and password protected, and also each document MUST be password protected (see \*\* note below).** No personal information is shared on social media associated with the Club. Random checks arranged by the Club Data Protection Officer will be made to see that the required security required is indeed being provided.

Payment Advice Sheet file: data received electronically from the Club Accountant and stored on a laptop secured at the private address of the Financial Director/ Treasurer. The laptop is connected to the Internet, and only accessible to the Financial Director/Treasurer. Paper copies are given to paid staff. **It is mandatory that this laptop MUST be user id and password protected, and also each document MUST be password protected (see \*\* note below).** No personal information is shared on social media associated with the Club. Random checks arranged by the Club Data Protection Officer will be made to see that the required security required is indeed being provided.

Club website contact details section: obviously open information as agreed with Club officials, but website security afforded to ensure no unauthorised modification, unavailability or destruction.

*[Note \*\*: for Word, Excel and PowerPoint – click on 'File', then 'Info', then 'Protect Document', then 'Encrypt with Password', then enter and confirm the password selected. Remember that passwords are case sensitive. Note that if you lose or forget the password it cannot be recovered – thus if you are sure re remembering fine, otherwise keep the password safe and secure. (For advice on all this please contact Robin Moses – contact details on the Club website.)*



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Access to the data on the RFU's GMS is determined by subject access controls - which means that only those who are assigned certain roles have the necessary permissions to access the data entered by the Club. It should be noted that the RFU is undertaking a review of how permissions to access GMS are allocated, with a view that the nominated "Data Officer" can decide who has what permissions (e.g. read only, read and write, or no access). Once this is up and running, it will mean having the right data security, and demonstrating that the right data security is in place, is much easier. The current player registration form and process is being reviewed. In particular, it is likely that all the data currently asked for is not necessary and, therefore, the forms and process can be slimmed down.

It should be noted that for many websites, a Cookie Policy that sets out how a website uses cookies. However, this does not apply for the Club as its websites do not use cookies.

Hopefully no data breaches will occur with the level of security in place, but please note the following.

A data breach is, put simply, a security incident that has affected the confidentiality, integrity or availability of personal data. There will be a personal data breach whenever:

- any personal data is lost, destroyed, corrupted or disclosed,
- if someone accesses the data or passes it on without proper authorisation,
- if the data is made unavailable and this unavailability has a significant negative effect on individuals.

There may be a number of ways this can happen, such as a lost laptop, a file sent to the wrong recipient or a hack. It need not be technical; a lost hard copy file will also be a data breach.

The Club has a procedure to manage, and if necessary report, a data breach. This encompasses acting quickly, deciding whether to inform those individuals whose data may have been disclosed, and deciding whether to inform the ICO. The procedure is contained in Appendix 2.

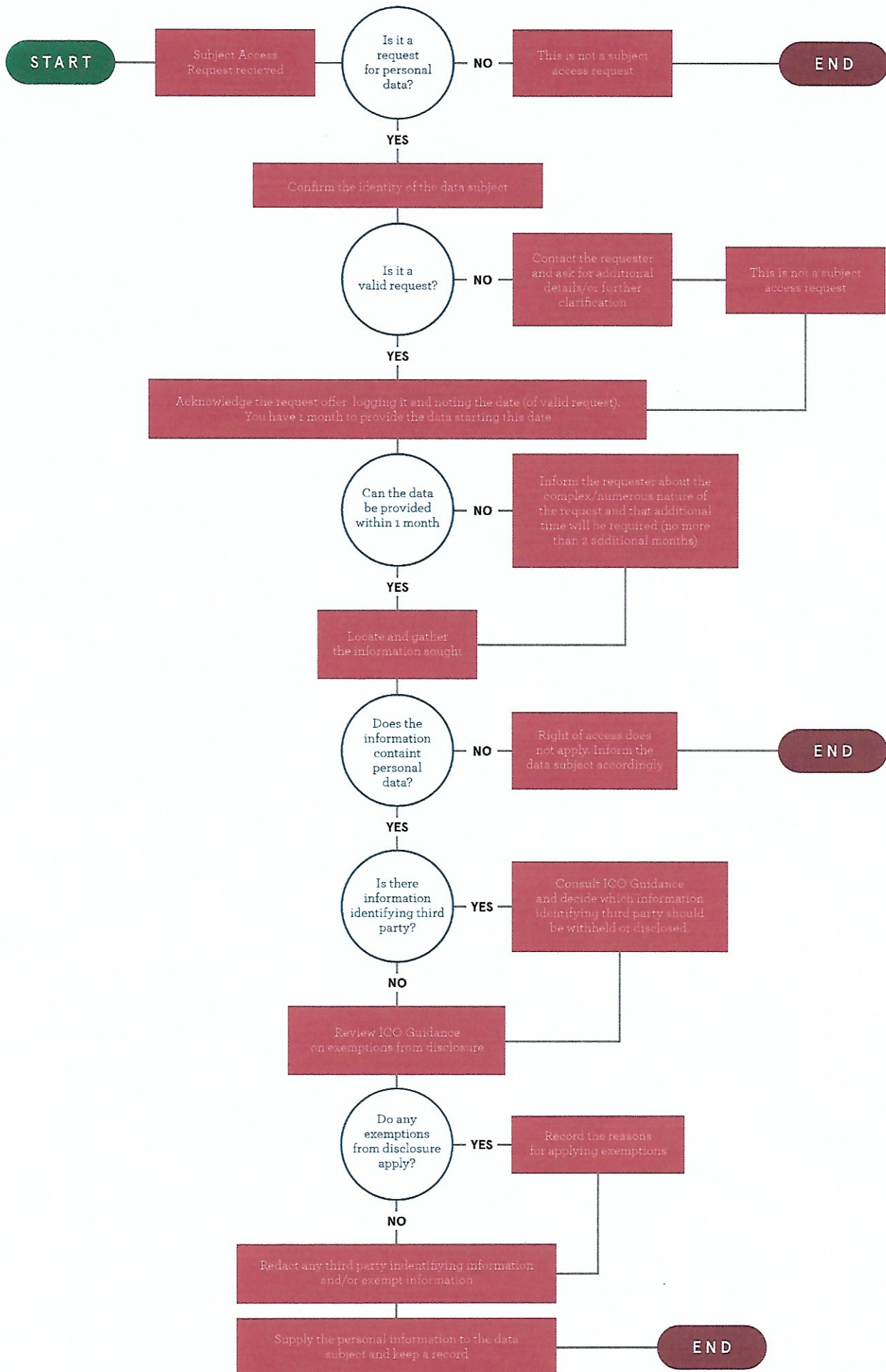
### Summary

Under GDPR, the key requirements for the Club are:

- a) a maintained up-to-date register showing what personal data the Club collects, holds and uses (on paper and electronically),
- b) a Data Protection (Privacy) Policy and Notice (this document),
- c) relevant procedures in place related to members who wish to exercise their rights, e.g. to ask for a copy of their personal data, to correct, delete or restrict (stop any active) processing of their personal data.
- d) enhanced security for paper and electronic personal data records: locked containers for paper records – and when no longer needed destruction by shredding; and user id and password for any laptop whatever holding electronic records PLUS every document being password encrypted – with the password managed 'centrally' and only issued to authorised people, - and random checks on all this,
- e) updated membership and other forms containing entry of irrefutable consent regarding the collecting and using the personal data – including with signatures (for children under 13 a parent must sign etc),
- f) a Club Data Protection Officer in place,
- g) all Club officials being well aware of the requirements under GDPR.

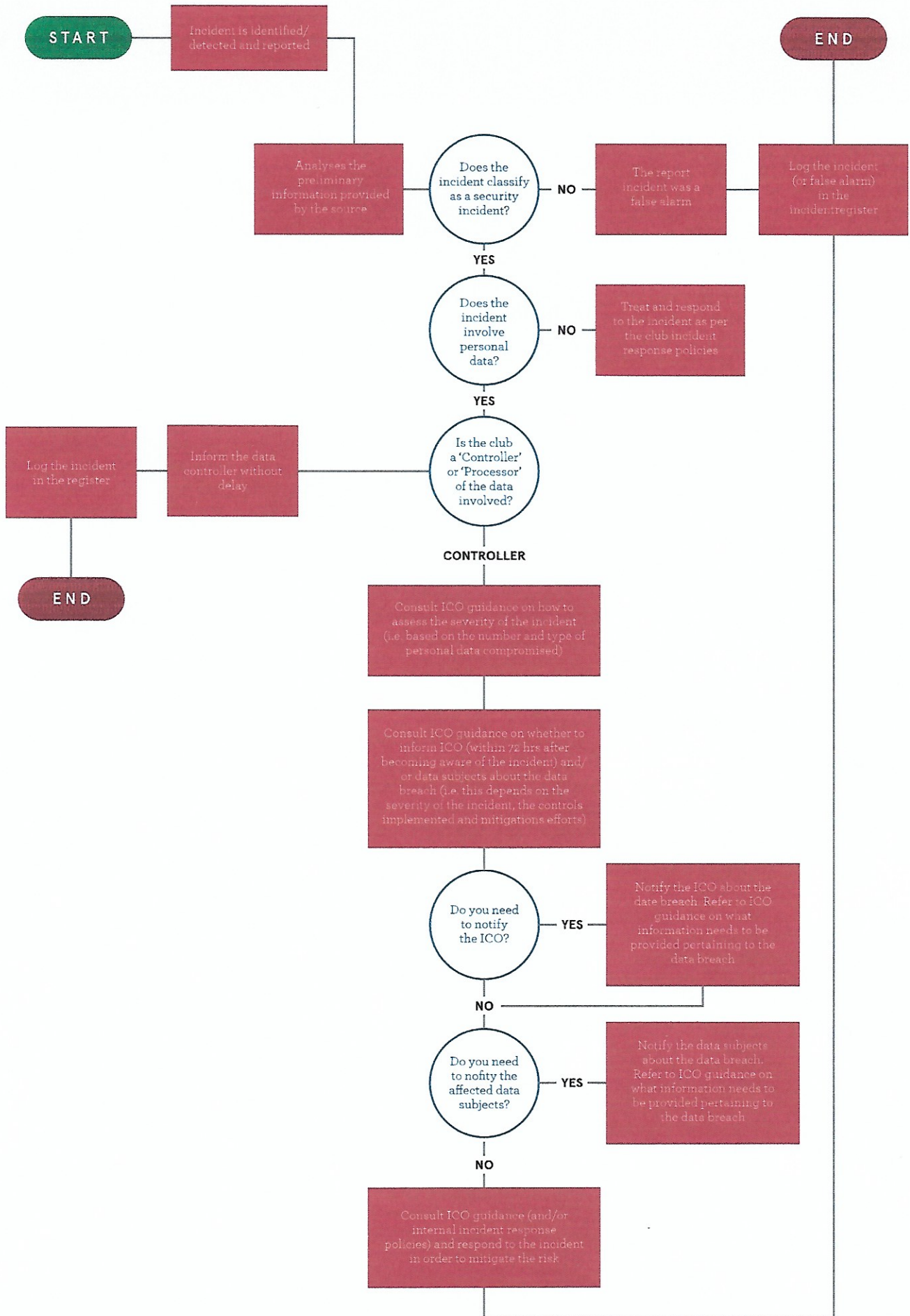


## SUBJECT ACCESS REQUEST FLOWCHART



## DATA BREACH MANAGEMENT FLOWCHART

Club members/  
other  
stakeholders



Information Security/Data Privacy Team (of a club)