



## Ashmount Leigh FC - Data Protection Policy

Ashmount Leigh FC is committed to being transparent about how it collects and uses the personal data including, in particular, that data of our volunteers, players, parents, and others we engage with.

This policy applies to the personal data of all such persons.

### Data Protection Principles

Ashmount Leigh FC processes personal data in accordance with the following data protection principles:

- Δ The club processes personal data lawfully, fairly and in a transparent manner
- Δ The club collects personal data only for specified, explicit and legitimate purposes
- Δ The club processes data only where it is adequate, relevant, and limited to what is necessary for the purposes of processing
- Δ The club keeps accurate personal data and takes all reasonable steps to ensure that inaccurate personal data is corrected or deleted without delay
- Δ The club keeps personal data only for the period necessary for processing

The club adopts appropriate measure to make sure that the personal data is secure, and protected against unauthorised or unlawful processing, and accidental loss, destruction or damage.

The club informs individuals the reasons for processing their personal data, how it uses such data and the legal basis for processing in its privacy notes. It will not process personal data of individuals for other reasons. Where the club relies on its legitimate interests as the basis for processing data, it will carry out an assessment to ensure that those interests are not overridden by the rights and freedoms of individuals.

### The Legal Basis on Which We Hold Personal Data

We hold personal data for the following permitted reasons provided by the GDPR - so one of these reasons will apply to your data:

- (a) **Consent:** the individual has given clear consent for you to process their personal data for a specific purpose.
- (b) **Contract:** the processing is necessary for a contract you have with the individual, or because they have asked you to take specific steps before entering into a contract.
- (c) **Legal obligation:** the processing is necessary for you to comply with the law (not including contractual obligations).

- (d) Vital interests: the processing is necessary to protect someone's life.
- (e) Public task: the processing is necessary for you to perform a task in the public interest or for your official functions, and the task or function has a clear basis in law.
- (f) Legitimate interests: the processing is necessary for your legitimate interests or the legitimate interests of a third party unless there is good reason to protect the individual's personal data which overrides those legitimate interests.

### **Individual rights**

As a data subject, individuals have a number of rights in relation to their personal data. Individuals have the right to make a subject access request. If such a request is made, the organisation will inform him/her:

- Δ whether or not his/her data is processed and if so why, the categories of personal data concerned and the source of the data if it is not collected from the individual; to whom his/her data is or may be disclosed, including to recipients located outside the European Economic Area (EEA) and the safeguards that apply to such transfers;
- Δ for how long his/her personal data is stored (or how that period is decided);
- Δ his/her rights to correction or erasure of data, or to restrict or object to processing;
- Δ his/her right to complain to the Information Commissioner if he/she thinks the organisation has failed to comply with his/her data protection rights; and
- Δ whether or not the organisation carries out automated decision-making and the logic behind any such decision-making.

Ashmount Leigh FC will also provide the individual with a copy of the personal data undergoing processing. This will normally be in electronic form if the individual has made a request electronically, unless he/she agrees otherwise.

To make a subject access request, the individual should send the request to [clubsecretary.ashmountleighfc@gmail.com](mailto:clubsecretary.ashmountleighfc@gmail.com). In some cases, the organisation may need to ask for proof of identification before the request can be processed. The club will inform the individual if it needs to verify his/her identity and the documents it requires.

The club will normally respond to a request within a period of one month from the date it is received. In some cases, such as where the club processes large amounts of the individual's data, it may respond within three weeks of the date the request is received.

If a subject access request is manifestly unfounded or excessive, the organisation is not obliged to comply. A subject access request is likely to be manifestly unfounded or excessive where it repeats a request to which the organisation has already responded. If an individual submits a request that is unfounded or excessive, the organisation will notify him/her that this is the case and its intended response.

### **Other rights**

Individuals have a number of other rights in relation to their personal data. They can require the organisation to:

- Δ correct any inaccurate data;
- Δ cease processing or erase data that is no longer necessary for the purposes of processing;
- Δ cease processing or erase data if the individual's interests override the organisation's legitimate grounds for processing data (where the organisation relies on its legitimate interests as a reason for processing data);
- Δ cease processing or erase data if processing is unlawful; and
- Δ cease processing data for a period if data is inaccurate or if there is a dispute about whether or not the individual's interests override the organisation's legitimate grounds for processing data.

To ask the organisation to take any of these steps, the individual should send the request to the email address on our website.

## Data security

Ashmont Leigh FC takes the security of personal data seriously. The organisation has internal policies and controls in place to protect personal data against loss, accidental destruction, missuses or disclosure, and to ensure the data is not accessed, except by club officials in the proper performance of their duties.

## Data breaches

If Ashmont Leigh FC discovers that there has been a breach of personal data that poses a risk to the rights and freedoms of individuals, it will report it to the Information Commissioner within 72 hours of discovery. The organisation will record all data breaches regardless of their effect.

## Individual responsibilities

Individuals are responsible for assisting the club keep their personal data up to date. Individuals should let the club know if data provided to the organisation changes, for example if an individual moves to a new house or changes his/her bank details.

Individuals who have access to personal data are required:

- Δ to access only data that they have authority to access and only for authorised purposes;
- Δ not to disclose data except to individuals (whether inside or outside the organisation) who have appropriate authorisation;
- Δ to keep data secure (for example by complying with rules on access to premises, computer access, including password protection, and secure file storage and destruction);
- Δ not to remove personal data, or devices containing or that can be used to access personal data, from the organisation's premises without adopting appropriate security measures (such as encryption or password protection) to secure the data and the device;
- Δ not to store personal data on local drives or on personal devices that are used for work purposes; and
- Δ to report data breaches of which they become aware to [name of individual/the data protection officer] immediately.

Failing to observe these requirements may amount to a disciplinary offence, which will be dealt with under the organisation's disciplinary procedure. Significant or deliberate breaches of this policy, such as accessing employee or customer data without authorisation or a legitimate reason to do so, may constitute gross misconduct and could lead to dismissal without notice.