



Vectis RFC Data Protection and Privacy Policy

The following policy written by **Vectis Rugby Club** (also referred as “the Club”, “we” or “us”), defines the clubs commitment to protecting personal data and correct collection and use thereof.

This policy describes how the Club will make use of the data we handle in relation to our members and players, including our use of the Game Management System (“GMS”) provided by the Rugby Football Union (“RFU”). The policy also describes the RFU’s use of data on GMS. In addition your data protection rights are explained, this includes what to do if you have any concerns, and how to contact us or the RFU.

The Clubs dedication and target is to:

- Ensure that data is collected fairly and lawfully
- Ensure that data is used fairly and lawfully
- Ensure the processing of personal data is used only for operational needs or to fulfil legal requirements
- Ensure adequate measures are taken to protect personal data
- Ensure that a nominated officer is responsible for data protection and is the main point of contact for all data protection issues
- Ensure that all club officers are made aware of good practice in data protection
- Ensure everyone handling personal data knows where to find further guidance
- Ensuring we meet with the six principles of GDPR (As listed below)
- Meeting our legal obligations as laid down by GDPR
- Regularly review procedures and guideline within the club, including appointing of a DPO (Data protection officer) if deemed to be required

Six principles of GDPR

1. Lawful, fair and transparent
2. Limited for its purpose
3. Adequate and necessary
4. Accurate
5. Not kept longer than needed
6. Integrity and confidentiality

Summary of how we and the RFU use your data

- Vectis RFC uses your personal data to manage and administer your membership and your involvement with its teams and club, and to keep in contact with you for these purposes.
- Some data is shared with the RFU, who use your data to regulate, develop and manage the game. They may be required to share data with other regulatory bodies such as the Disclosure and Barring service (in order to undertake a DBS check).
- Where we or the RFU rely on your consent, such as any consent we seek for photographs, share medical details with first aiders or team managers, you can withdraw this consent at any time.
- Amongst the data we collect from you may be medical (including injury) information. We will hold this where you (or your parent, if you are under the age of 18) have given consent, so that we can ensure we are aware of your condition and 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. It also describes your data protection rights, including a right to object to some of the processing which we carry out. More information about your rights, and how to exercise them, is set out in the “What rights do I have?” section.

What information do we collect?

We collect and process personal data from you or your parent when you join and when we carry out annual renewals of your membership. This includes:

- 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, or any key role you may have been allocated, such as Chair, Safeguarding Lead, Membership Secretary etc.;
- your payment and/or bank account details, where you provide these to pay for membership;
- your marketing preferences, including any consents you have given us;
- your medical conditions or disability, where you provide this to us with your consent (or your parent's consent) to ensure we are aware of any support we may need to provide to you.
- your passport and NI details, where we have to check identity, prior to DBS for example.

Note: On the Vectis RFC registration form will be details of the consent relating to GDPR.

Some information will be generated as part of your involvement with us, in particular data about your performance, involvement in particular matches via match reports and details of any disciplinary issues or incidents you may be involved in on and off the pitch, such as within health and safety records.

What information do we receive from third parties?

Sometimes, we receive 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 do we use this information, and what is the legal basis for this use?

We process this personal data for the following purposes:

- 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 enter a competition. This includes:
 - taking payments;
 - communicating with you;
 - providing and arranging the delivery or other provision of products, prizes or services;
- As required by the Club to conduct our business and pursue our legitimate interests, in particular:
 - we will use your information to manage and administer your membership and your involvement with its teams and club, and to keep in contact with you for these purposes;

- we will also use data to maintain records of our performances and history, including match reports, score lines and team sheets;
- we may choose to send you information by email, about offers relating to similar products and services that you have already bought, i.e. club kit.
- Where you give us consent:
 - we will send you direct marketing or promotional material by email;
 - we may handle medical or disability information you or your parent provides to us, to ensure we support you appropriately;
 - on other occasions where we ask you for consent, we will use the data for the purpose which we explain at that time.
- For purposes which are required by law:
 - we maintain records such as health and safety records and accounting records in order to meet specific legal requirements;
 - we ensure, where you will work with children, that you have undergone an appropriate DBS check – this is also carried out with your consent.
 - where you hold a role at the Club requiring us to check your right to work, we may process information to meet our statutory duties;
 - we may respond to requests by government or law enforcement authorities conducting an investigation.

How does the RFU use any of my information?

The RFU provides GMS, but make its own use of the following information:

- 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 Chair, 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; and
 - 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 also carried out with your consent.
 - The RFU may respond to requests by government or law enforcement authorities conducting an investigation.

Who do we share your data with?

Data you supply to us is held on a secure database, GMS for any RFU required operations or Pitchero for contact information if required and relevant. In most cases the information will be placed into Pitchero by the data subject (person to whom the data applies). A paper copy maybe held securely of the registration form by the membership officer and only accessed by said person. The RFU has its own data protection policy which can be accessed here: <http://www.englandrugby.com/governance/club-support/gdpr/>.

Access to the Data you provide that is placed on GMS or Pitchero, is determined by subject access controls. This means that only those with necessary permissions and relevant appointment within the club can access it. For example Team manager will only have access to emergency contact and relevant medical conditions. The registration officer and safeguarding officials will have access to all the information you provide us.

In addition to sharing data with the RFU, we will share your data with Team managers and Coaches, where contact details need to be shared on match days, for training information, or medical information, where this is necessary for player welfare or injury reporting.

Some limited information may be shared with other relevant parties involved in rugby, such as other clubs, Constituent Bodies, referee societies, league organisers, so that they can maintain appropriate records and assist us in organising matches and administering the game.

Personal data may be shared with government authorities and/or law enforcement officials if required for the purposes above, if mandated by law or if required for the legal protection of our or the RFU's legitimate interests in compliance with applicable laws.

Personal data will also be shared with third party service providers, who will process it on our behalf for the purposes identified above. Such third parties include the RFU as the provider of GMS, and any secure GDPR compliant data handler they would employ i.e for DBS checks.

We will not give information about you or your child(ren) to any third parties without your consent unless the law allows us of instructs us to do so. If this were to happen, decisions on whether England Rugby releases your relevant personal data to third parties are subject to a robust approval process and are based on a detailed assessment of who is requesting the data, why it is required, its level of sensitivity and where it will be stored and handled. An example of this is where the club maybe required under law to exchange information with statutory agencies such as welfare services or the police to protect or

safeguard vulnerable children, detect a crime, or when exchange of information is required for a child moving to another club.

Withdrawing consent or otherwise objecting to direct marketing

Wherever we rely on your consent, you will always be able to withdraw that consent, although we may have other legal grounds for processing your data for other purposes, such as those set out above. In some cases, we are able to send you direct marketing without your consent, where we rely on our legitimate interests. You have an absolute right to opt-out of direct marketing, or profiling we carry out for direct marketing, at any time. You can do this by following the instructions in the communication where this is an electronic message, or by contacting us using the details set out below in the “**How do I get in touch with you or the RFU?**” section.

What rights do I have?

You have the right to **ask us for a copy** of your personal data; to **correct, delete or restrict** (stop any active) processing of your personal data; and to **obtain the personal data you provide to us for a contract or with your consent in a structured, machine readable format**.

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, or where we are using the data for direct marketing).

These **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 us– or, as appropriate, the RFU or its data protection officer – using the details set out below. If you have unresolved concerns, you have the **right to complain** to the Information Commissioner's Office.

Much of the information listed above must be provided on a mandatory basis so that we can make the appropriate legal checks and register you as required by RFU Rules and Regulations. We will inform you which information is mandatory when it is collected. Some information is optional, particularly information such as your medical information. If this is not provided, we 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?

We hope that we can satisfy queries you may have about the way we process your data. If you have any concerns about how we process your data, you can get in touch via the Vectis RFC Pithcero membership database: <http://www.vectisrugby.co.uk/>

If you have any concerns about how the RFU process your data, you can get in touch at 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 you retain my data?

We process the majority of your data for as long as you are an active member and for up to 1 year after this. We will not keep it for any longer than is permitted by law.

Where we process personal data for marketing purposes (Club merchandise for example) or with your consent, we process the data for 1 year unless you ask us to stop, when we will only process the data for a

short period after this (to allow us to implement your requests). We also keep a record of the fact that you have asked us not to send you direct marketing or to process your data indefinitely so that we can respect your request in future.

Where we process personal data in connection with performing a contract or for a competition, we keep the data for 6 years from your last interaction with us.

We 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 <http://www.englandrugby.com/about-the-rfu/privacy-policy/>

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

This policy is effective from 22 May 2018