



Wessex Cyclo - Cross



Wessex Cyclo Cross GDPR Policy Rev. 1 08-08-2018

Who this is for and what does it apply to?

The current Data Protection (DP) regulations are being updated in May 2018 to be consistent with European legislation known as the General Data Protection Regulation (GDPR). Data Protection regulation applies to all organisations that hold any information that identifies living people.

DP rules do not apply to organisations holding only organisation data, with no names attached and the rules do not apply to individuals holding address books or, for example, Christmas card lists on computer.

In Cycling, DP applies to the lists of young people, adults and any other people recorded in a structured way for their future contact. It applies to the use of the British Cycling membership system and Organisers Platform. It applies to information gathered from the website and racing information forms. It does not apply to incidental naming of people in, for example, minutes of meetings or action lists.

Commitment

Wessex Cyclo Cross is committed to fully complying with the DP rules. This means that every person (committee members, administrators, honorary officers and organisers) involved in Wessex Cyclo Cross will observe this Policy.

Formal Contact

Wessex Cyclo Cross is the Data Controller. The contact address is Keith Pitcher, 12 Link Way, Arborfield, Reading, RG2 9PD. Wessex Cyclo Cross processes personal data using paper and electronic systems. It works with partner data processors including; British Cycling, Google, Microsoft, etc. Wessex Cyclo Cross has determined that the partner organisation data processing on its behalf is compliant with GDPR as far as it can assess.

The Legal Basis of our Data Processing

Wessex Cyclo Cross is an unincorporated sporting organisation. The people it serves are the participants in its events. Adults in committee roles are members. The Wessex Cyclo Cross also processes data of helpers and benefactors.

To achieve the purposes of the organisation we process data ***for our legitimate interests***

This includes processing for the purposes of

- Administration of the Racing Programme and Activities
- Governance
- Safety and safeguarding

This includes processing by holding paper and electronic records, processing with the facilities or our data processing partners and sending communications by paper and electronic means.

We process data ***for legal reasons***

This includes for the purposes of

- Maintaining safety and safeguarding records in compliance with the British Cycling rules.
- Maintaining accounting records as required by HMRC regulation

We process data by reason of ***data subjects' consent***

This includes for the purposes of

- Organising cycling events
- Communicating by direct mail or electronic communications

Special Categories of Personal Data

Data will be processed about members' and adult helpers' age and gender.

The personal data of members, competitors and adult helpers we process will include full name and contact details, date of birth and age. Relevant records will be kept for the management of Safety, Safeguarding and Personnel.

Website information will be kept for the effective management of the website and statistical purposes.

Financial information about bank accounts, payment of affiliation and race fees, and the maintenance of records as required by regulations.

Sharing of your Personal Data

Subject to Data Protection regulations the Wessex Cyclo Cross will share your data as relevant with British Cycling and organising Clubs to enable to provision of racing programme, training opportunities, administration and promotion.

It would be shared to comply with legal requirements when necessary or others when we have your consent.

It would be shared with medical services to protect your vital interests

It would be shared when relevant for the good administration of the organisation and security of our processes.

It will be processed by partner data processors including cloud-based services for the good administration of the Wessex Cyclo Cross and achievement of its charitable purposes.

Personal data may be transferred outside the UK and European Economic Area (EEA) through the use of cloud computing systems.

Confidentiality

Wessex Cyclo Cross is an organisation with approximately ten committee members, fifty member clubs and six hundred registered members with various levels of access to groups of information. All persons with access to personal data are required to maintain that personal data in confidence and not to share it outside a "need to

know” basis. All persons with access to personal data are required to agree to a Confidentiality and Data Protection statement. Anyone accessing personal information is required to only use devices that are secure by being in their own homes or scouting offices else be protected by password and encrypted, and with system security and data back-up.

Safeguarding Partnership

The Wessex Cyclo Cross is a member of British Cycling and complies with its Policy, Organisation and Rules, including the safeguarding processes. Personal information will be passed to British Cycling for their processes. Information will be passed to the Police when there is a relevant concern.

Subject Access

Any person who is the subject of personal data held by Wessex Cyclo Cross may make a subject access request by contacting: Keith Pitcher, 12 Link Way, Arborfield, Reading, RG2 9PD. The request will be processed in accordance with current regulation.

People can log into British Cycling, if they are a British Cycling member, to access and edit their data.

Not registered with ICO

As a sporting organisation, Wessex Cyclo Cross, is handling personal data only for the purposes of maintenance of its sporting activities and is not required to notify the Information Commissioners Office (ICO) or to pay the Data Protection fee.

Your Rights under Data Protection Regulation

Your rights are as follows

To be informed about how we process your personal data: this Data Protection and Privacy Policy seeks to provide that information

To have any erroneous personal data corrected: Wessex Cyclo Cross requests all members to notify any changes and will update information without delay.

To object to processing: Wessex Cyclo Cross will comply with your request as far as possible, some records are maintained for the formal administration of the organisation, for safety and for safeguarding purposes when retention of records will be required.

To restrict processing: Wessex Cyclo Cross will comply with your request as far as possible,

To have your personal data erased: Wessex Cyclo Cross will comply with your request as far as possible.

To request access: Wessex Cyclo Cross will comply with current regulations

To move, copy or transfer your personal data: Wessex Cyclo Cross will comply with your request as far as possible.

Questions about Data Protection or the use of Personal Data

Any questions or comments about data protection or this policy, notwithstanding your rights above, should be addressed to the Wessex Cyclo Cross Chairman (or Data Protection officer) at Keith Pitcher, 12 Link Way, Arborfield, Reading, RG2 9PD.

Members Personal records

The personal membership profile of each member is kept on the Wessex database. It is the responsibility of each member to ensure that they keep their own record up to date, by informing the Wessex Committee if any changes are required.

Internal and Other Directories

The compilation of any directory must have the approval of the committee. Directories must only contain the information that is specifically consented to include. The request for consent must include information about access to or distribution of the directory. The directory must be kept-up to date by a named person.

Racing Programme Registration

Personnel will use appropriate and secure methods to gather information for registration. Only information that is necessary for the purpose will be requested. Information may be gathered by paper or online forms. A data protection statement will be included in the form stating the whole use of the data and specifically identifying any sharing or not.

Registration data will often form part of relevant racing and safeguarding information and so will be kept for the relevant time scale.

Retention of records

Records will be retained for the good administration of the Wessex Cyclo Cross.

- For governance matters - indefinitely
- Attendance records for safeguarding purposes – indefinitely
- Notes and records from Safeguarding investigations will be kept locally
- For accounting purposes for 6 years after the end of the relevant year

Consent for children

Consent for children (under 16's) to participate in activities and to receive communications will require parental / guardian consent.

Use of Images

Members, and their parents if under 18, will be asked about their consent for the use of photographs and video for Wessex Cyclo Cross to use for use on the website, in promotional literature and items and social media. This permission will continue until changed or the member leaves. It should be noted that images in the public domain cannot be withdrawn.

Consent to electronic mailings - unsubscribe

Mailings will be sent for notification of events, administration and governance. Anyone who wishes not to receive such mailings, providing it is not a duty, will be unsubscribed. All mailings will have an Unsubscribe facility.

Communication of this Policy

This policy is placed on the website and is available from Wessex Cyclo Cross.

Review of this Policy

This Policy will be reviewed periodically as any changes in regulations or best practice occur; this will be at least every 3 years.

Agreed

This Policy was agreed by the Wessex Cyclo Cross on 2018

Signed:Chairman Date: