



Gosport and Fareham District Mixed Triples League

General Data Protection Regulations (GDPR) Policy

This document is the policy statement of the Gosport Fareham and District Mixed Triples League in respect of its statutory obligations under General Data Protection Regulations (GDPR) - UK Data Protection Act 2018. The policy is owned by the Executive Committee of the League.

In the event of any conflict between the Constitution of the League and this GDPR policy, the Constitution of the League will prevail, other than if any such outcome would jeopardise the League's lawful obligations or position under the General Data Protection Regulations.

The League is committed to ensuring compliance with the provisions of the General Data Protection Regulations:

- Meet its legal obligations under the General Data Protection Regulations.
- Ensure that data is collected and used fairly and lawfully.
- Process personal data only in order to meet its operational needs or fulfil its legal requirements
- Take steps to ensure that personal data is current and accurate.
- Establish appropriate retention periods for personal data.
- Adhere to Article 15 granting an individual access to their personal data upon request.
- Adhere to Article 17 granting an individual the right to have their personal data erased.
- Provide adequate security measures to protect personal data.
- Ensure its relevant officials' computer security software is current.
- Ensure that a nominated Committee Member is responsible for advising the Committee on its responsibilities for data protection compliance and acts as the contact for all data protection issues.
- Ensure that all League officials are made aware of good practice in data protection.
- Ensure that queries to the League about data protection are dealt with effectively and promptly.
- Regularly review data protection procedures and guidelines within the League
- Ensure that all League officials handling personal data know how/where to find further guidance.

The League's Operational Management System for Data Protection (GDPR)

The 'Data Controller'¹ is the Executive Committee, responsible for the League's Data Protection policy and practices. It owns this Policy Statement and directs Data Processors¹.

In practice, there is a primary contact and lead adviser to the Executive Committee on all GDPR matters; this adviser is appointed by the Executive Committee, and will typically also be a Member of that Executive Committee, in addition to having subject matter expertise.

What is the legal basis for holding such personal data?

Personal data¹ is any data that relates to an identified or identifiable individual.

The League's purpose in holding such data is to administer effectively the League's activities:

- enabling communication among and between League Officials and Club Officials
- providing visibility of Competitions and similar bowling activities/events
- providing selected contact data of competition entrants for arranging matches

This is known within GDPR as 'legitimate interest' and is the legal basis for the League to collect, store and process individuals' personal data. 'Consent' is the legal basis for other selective data[†], where held.

What personal data does the League hold?

The League's Officers, as 'Data Processors', typically collect, store and process selected personal data, including:

- Officers: Name, Contact Phone, Home address, E-Mail address
- Other Officials / Club Officials with League-related roles: Name, Contact Phone, E-Mail address
- League-registered Bowlers / Cup Bowlers: Name
- Competition Entrants: Name, Contact Phone and/or E-mail address
- For junior players or adults-at-risk: additional information required under safeguarding legislation and practices, and supplied by parent/guardian or responsible adult.

¹ See [GDPR Definitions](#)

- (Potentially) Images[†] of Bowlers/Officials with consent, from the League's events, for website use
- (Exceptionally) Bank Account data[†] of individuals
 - for making EFT² payments; provided by the payee with consent, for this specific transient use; held on the League's Bank's systems, with access only by authorised League Officers

How does the League store and process such data?

Data is typically stored by selected officers, as data processors, on their personal computer(s), including any online back-up or similar cloud storage facility, although some records may be held in hard-copy. Such computers are required to have security software active. The League holds no financial data on individuals (other than any bank account information[†] provided with consent for EFT² payments and held on the League's Bank's systems).

Data Processor Organisations providing data storage or back-up services to any of those above include:

- Our Banking services provider, whose systems hold any payees' bank account data for EFT² payments.
- Our Website-provider partner (the HugoFox organisation), whose platform is used to store and process data under the direction of the League's Webmaster, including
 - any messages/forms facility, enabling a user to send an e-mail to the League
 - personal data (potentially including images) of selected League/Club Officials and of Bowlers in Competitions/Events.
 - for those who access, or may subscribe to the 'e-mail alert' notifications service from, our website, such use and GDPR compliance is governed by a 'Website Privacy and Use' Policy, accessible from each website page. Such individual-level user/subscriber personal data is not held by, nor is available to, the League's Officers, other than from messages/forms as above, received by the League.

With whom does the League share such data?

Selected personal data of League Officials, and of selected constituent Club Officials and Competition entrants, may be visible on the League's website, and/or shared with relevant Club Officials and Competition entrants.

Such personal data shared to selected constituent Club Officials and Competition entrants is the contact data allowing communication between League team captains and Competition entrants to arrange and participate in such matches and competitions.

Personal data controlled by the League is not otherwise shared with external organisations, nor is it sold for marketing purposes.

Retiring League Officials

When a League Official retires from the role, in any circumstance, it remains the retiring Official's responsibility to

- relinquish possession of all personal data either to their successor in the role or to the League Secretary, and/or delete/destroy all personally-held (hard/soft) copies of that data.
- declare formally to the League, via the League Secretary, that this task has been completed, with details, and that the retired Official no longer holds any personal data collected or held in that former role.

Data Access and Data Erasure

Anyone whose personal data is held by the League has the right to access and view this data. A Subject Access Request (Article 15), grants every individual the right to a copy of all their personal data held by the League. The League will provide this data in an electronically transportable format usable by the requesting individual. The Right to be Forgotten (Articles 16/17) entitles an individual to have this data erased, albeit with certain allowed limitations. The League recognises that not fulfilling these entitlements would deny GDPR rights and may attract penalties.

Data Breach

In the event of a data breach which poses a threat to the privacy of anyone's personal data held by the League becoming known to the League, the League will investigate and, within 72 hours, will then inform each identified affected person.

The League will take appropriate measures to safeguard other data, to re-protect data identified as involved in the breach, and to minimise the risk of recurrence.

² Electronic Funds Transfer (aka 'Bank transfer' / 'online transfer' / 'BACS transfer')