

BIGFOOT MOUNTAIN BIKE CLUB



PERSONAL DATA POLICY

VERSION HISTORY

Version	Changes Made	Author	Date
1.0	Original Document	Membership Secretary	04 May 2022



BIGFOOT MOUNTAIN BIKE CLUB



PERSONAL DATA PRIVACY POLICY

INTRODUCTION

1. This is Version 1.0 of the Personal Data Privacy Policy of the Bigfoot Mountain Bike Club agreed by the Club's Committee at its monthly meeting held at The Royal William in Cranham on 4 May 2022.
2. This policy is produced to support compliance with UK GDPR which is implemented through the UK Data Protection Act 2018.¹ It covers the routine collection of Club Members' personal data² processed³ by BIGFOOT Mountain Bike Club, hereafter referred to as "the Club", to support its legitimate activities. The policy explains why the data is collected, what it is used for, how it is stored and how long it is kept. It sets out Club Members' rights and the Club responsibilities and how Club members can query the Club's holdings of their data.
3. If there is a requirement to use personal data in a manner not covered in this policy or, if the UK's data protection laws change in a way that affect the Club's activities and/or use of personal data, changes to this policy will be made by the Club Chair following agreement by the Club's Committee. Unless urgent, changes will only be made on an annual basis at a time when memberships are due for renewal.
4. At a minimum, this policy will be reviewed two years from the date of the current version.

DATA CONTROLLER

5. The Data Controller for the personal data referred to in this policy is the Club. Any questions with regards the policy should be directed to the Club Chair on chairperson.bigfootmbc@gmail.com.
6. As a not-for-profit organisation, the Data Controller (i.e. the Club) is exempt from paying a data protection fee.⁴

¹ <https://www.gov.uk/data-protection>

² Personal data is data that enables individuals to be identified directly or, in combination with other information, indirectly.

³ Includes collecting; storing; accessing; and deleting.

⁴ <https://ico.org.uk/for-organisations/guide-to-data-protection/guide-to-the-general-data-protection-regulation-gdpr/data-protection-fee/exemptions/>

GDPR PRINCIPLES

7. Article 5 of the UK GDPR sets out 7 principles⁵ that the Club should adhere to, and that this policy applies. These are that personal data must be:
- a. Processed lawfully, fairly and in a transparent manner in relation to individuals. This principle is met by the publication of this policy.
 - b. Collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes. This principle is met by only using data for the running of the Club.
 - c. Adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed. This principle is met by only collecting data that is required for the running of the Club.
 - d. Accurate and, where necessary, kept up to date. This principle is met by annually asking members to confirm their details remain extant.
 - e. 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. This principle is met by having a data retention aspect of this policy.
 - f. Processed in a manner that ensures appropriate security of the personal data. This principle is met by having rules in place that dictate how personal data may be processed.

LAWFUL BASIS

8. The UK GDPR sets out 6 lawful bases⁶ on which processing of personal data may take place; the Club uses 3 of these which are:
- a. **Legitimate Interest.** This is where processing is necessary for the legitimate interest of the Club, i.e. the running of the Club. If individuals do not agree to the use of their data for activities deemed necessary then, unfortunately, membership will be denied.
 - b. **Consent.** This is where a club member has given the Club permission to use their data for a specific purpose, an example being the sending out of a

⁵ <https://ico.org.uk/for-organisations/guide-to-data-protection/guide-to-the-general-data-protection-regulation-gdpr/principles/>

⁶ <https://ico.org.uk/for-organisations/guide-to-data-protection/guide-to-the-general-data-protection-regulation-gdpr/lawful-basis-for-processing/>

newsletter. Not giving their permission does not deny them membership of the Club while consent may be withdrawn at any time.

- c. **Vital Interest.** This is where personal data is used when someone's life is at risk, or they have been seriously injured. An example may be calling the emergency services in the event of a member being involved in an accident. If individuals do not agree to the use of their personal data when their life may be at risk or they are seriously injured then, unfortunately, membership will be denied.

DATA COLLECTED

9. The Club only collects personal data about its members that is provided directly by the members and is required for the running of the Club.
10. The Club does not sell personal data to third parties for any purpose and does not collect or compile personal data for dissemination to third parties for marketing purposes.
11. **Data that Club Members must provide.** Personal data Club members must provide is:
 - a. First and last name.
 - b. Contact Details including email, mobile and/or landline phone numbers, postal address.
 - c. Date of Birth.
12. **Data that Club Members may be asked to provide.** Personal data Club members may be asked to provide or give permission to use is:
 - a. The phone number and name of an individual who will act as the Club member's ICE⁷ contact.
 - b. Bank account details.⁸
 - c. Images of Club members.
 - d. Training qualifications pertinent to the Club's activities.

⁷ In Case of Emergency

⁸ Must be provided if a Club member wishes to receive a refund of expenses incurred on behalf of the Club

13. **Collection of Personal Data.** Data is mainly collected on the membership form when a member joins the Club. Data such as images and bank details is collected as and when required to meet the purpose for which it will be used.

14. **Ensuring Personal Data is Current.** To ensure Personal data remains current, Club Members will be asked to verify it annually when their membership is renewed. Club Members also have a responsibility to inform the Membership Secretary⁹ if their personal details change at any time during their membership.

HOW THE DATA IS USED

15. The table below details how the Club uses the information it collects, the types of information used and the lawful basis for being able to do this.

Ser	Purpose	Information Used	Lawful Basis
	(a)	(b)	(c)
1	Administering Membership	First and Last Name Email Address Postal Address Mobile and/or Landline Numbers	Legitimate Interest
2	Ensuring members meet the Club's age restrictions (18 years old and above)	Date of Birth	Legitimate Interest
3	Informing Members of changes to the Club's Constitution or Privacy Policy	Email	Legitimate Interest
4	Adding a member to the Club Website to enable them to access the Members Only area	First and Last Name Email address	Consent
5	Refunding expenses incurred by Club members on behalf of the Club	Bank Details	Consent ¹⁰

⁹ membership.bigfootmbc@gmail.com

¹⁰ Note, BACS is the only method of transferring funds, cash or cheque are not acceptable. Therefore, if a member wishes to be refunded, they must provide their bank details. Following transfer, they may request for the bank details to be removed from the Club's bank account.

Ser	Purpose	Information Used	Lawful Basis
6	Posting Club Kit that they have purchased out to Club Members	Postal Address	Consent
7	Sending out a Club Newsletter	Email Address	Consent
8	Informing a Club Member's ICE contact if the Club member has been involved in an incident and cannot inform them themselves	ICE Name & Phone Number	Consent (if ICE details provided)
9	Informing the Emergency Services about an incident a Club Member has been involved in that has resulted in a risk to their life or serious injury.	First and Last Name Mobile and/or Landline Numbers Postal Address Date of Birth ICE details (if provided)	Vital Interest
10	Posting Images on the Club website, Facebook page, Twitter, or Instagram account.	Images	Consent
11	Maintaining a record of Members' qualifications relevant to the Club's activities.	Training Qualifications	Consent

DATA SECURITY

16. Apart from bank details and imagery, the Club uses Google Drive to manage personal data thus, the personal data is stored by Google Cloud. Google Cloud is compliant with GDPR, see <https://cloud.google.com/privacy/gdpr>.
17. Access to personal data held on Google Drive is controlled by the membership Secretary and he is the only individual with write access. Read access is available to all other Committee members but, not the ability to copy or download the information.
18. Any Member's bank details held by the Club are held in the Club's bank account and managed by the Club Treasurer; no-one else has access to this information.

19. Imagery that may be used to identify a Club Member can only be used with the Members consent and may be found on any of the platforms used by the Club, see section on Social Media. Should a member wish an image in which they are shown to be removed, they should contact the Club Chair.
20. No personal data is held in hard copy or on Committee Member's personal computers.

DATA BREACHES

21. Should a personal data breach be suspected, the Club Chair will assess the case in line with the Information Commissioner's Office guidance¹¹ to identify whether there has been a risk to Club members. If it is assessed a risk has occurred, then the breach shall be reported to the Information Commissioner's Office (ICO).¹²

SOCIAL MEDIA SITES

22. The Club uses Slack, Instagram, Twitter, Facebook, and a Club website hosted by WordPress to advertise their activities and for Club members to communicate. On joining, and if they consent, Club Members will be added to the Club Website by the Membership Secretary to enable them to access the Members Only section; joining the other platforms is a Member responsibility/decision.¹³ For all these platforms, it is the Member's responsibility to ensure that the platform's Privacy Policies meet the Member's requirements.¹⁴ The Club is not responsible for these platforms.

DATA RETENTION

23. **During Club Membership.** The Club will retain personal data for the duration of a Club Member's membership. Unless it is data which is classified as that which Members must provide, see section on Data Collected, Club members may ask for personal data to be deleted at any time.
24. **Following Termination of Membership.** On termination of Membership, with the exception of name, date of birth and post code, all personal data will be deleted within 6 months of membership termination. Individuals' names, date of birth and post codes will be retained for historical analysis of membership profile, numbers, renewal statistics, and geographic location.

¹¹ <https://ico.org.uk/for-organisations/report-a-breach/personal-data-breach-assessment/>

¹² <https://ico.org.uk/for-organisations/report-a-breach/personal-data-breach/>

¹³ For the Club's Slack account, on joining, members will be given a link by the Membership Secretary to enable them to sign up to it.

¹⁴ WordPress state that as of version 4.9.6 they are GDPR compliant:

<https://www.wpbeginner.com/beginners-guide/the-ultimate-guide-to-wordpress-and-gdpr-compliance-everything-you-need-to-know/>

MEMBERS' RIGHTS

25. Under data protection law, members have the following rights:

- a. **Right of Access.** The right to request copies of personal data held.
- b. **Right to Rectification.** The right to ask the Club to rectify personal data they believe to be incorrect or complete information believed to be incomplete.
- c. **Right to Erasure.** The right to request erasure of all personal data held on termination of membership and, while a member, personal data not classified as that which a member must provide in order to be a member; see section on Data Collected. If a member requests that all their personal data is erased, they cannot retain membership.
- d. **Right to Data Portability.** Should a member join another Club, a member has the right to ask the Club to transfer personal data to said club. This excludes imagery as it may be used to identify other individuals. Transfer is only a right if it is carried out by electronic means and in a format readily accessible to the Club.
- e. **Right to Object to Processing of Personal Data.** Where the lawful basis is "Consent", members may ask for their data not to be processed.
- f. **Right to Restriction of Processing of Personal Data.** Where the lawful basis is "Consent", members may ask for processing of their data to be restricted. They may also request for the processing to be restricted if they believe their data to be incorrect.

26. Should a member wish to enact any of the above rights, in the first instance they should contact the Club Chair at chairperson.bigfootmbc@gmail.com.

COMPLAINTS

27. If a member has any concerns about the Club's use of their personal data, they should make a complaint to the Club Chair at chairperson.bigfootmbc@gmail.com.

28. If by contacting the Club Chair this does not satisfy their request, Club Members may contact the Information Commissioner's Office in one of the following ways:

- a. Postal Address:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire SK9 5AF

- b. Helpline Number: 0303 123 1113

c. ICO website <http://www.ico.org.uk>