



Data Protection Policy

This Policy addresses the club's use of data and its dissemination. This Policy binds all club Officials and members.

This procedure is in line with the rules of the governing body (UKA) and the England Athletics Disciplinary Procedure.

This policy implements the statutory requirements contained within the Data Protection Act 1998 (hereafter DPA 1998).

DATA RECORDING

1. Data will be retained by Westbury Harriers for the following purpose(s):
 - a. Establishing or maintaining membership;
 - b. Supporting the continuation of the club as a not for profit organisation;
 - c. Providing or administering activities for members and those who are involved in the club.
2. Westbury Harriers is bound by the eight principles set out at Schedule 1 of the DPA 1998.
3. **Processing Personal Data Fairly and Lawfully**
 - a. Westbury Harriers will only collect and use personal data where there are legitimate and reasoned grounds for so doing;
 - b. Westbury Harriers will not use data in a way which would have unjustified and adverse effects upon the individuals concerned;
 - c. The club will be transparent about the purpose of any data collected;
 - d. Members will be provided with appropriate privacy notices when personal data is collected;
 - e. Personal data will be handled only in a manner which the subject individual would reasonably expect;
 - f. Personal data will not be used in a way which is or may be construed as unlawful.
4. **Processing Personal Data for Specified Purposes**
 - a. Personal data will only be obtained for one or more specified and lawful purposes;
 - b. Personal data will not be processed in any manner which is incompatible with the intended purpose;
 - c. Club members will be fully informed as to the purpose for the collecting of data and its intended use;
 - d. Westbury Harriers will fully comply with the fair processing requirements set out in the DPA 1998;
 - e. In the event that the club seeks to use or disclose personal data for any purpose that is additional to, or different from, the originally specified purpose, the Committee will inform members without delay and ensure that the proposed new use or disclosure is fair.
5. **The Amount of Personal Data Held**
 - a. Any personal data held will be adequate and relevant and not excessive;
 - b. Westbury Harriers will only hold such personal data as is sufficient for the intended use.



6. ***Personal Data must be Accurate and Up to Date***

- a. Westbury Harriers will take such steps as are reasonable practicable so as to ensure that personal data held is accurate;
- b. Westbury Harriers will ensure that the source of any personal data held is clear;
- c. The Committee will carefully consider any challenges to the accuracy of information held;
- d. The Committee may seek to request updating information from the club's members as appropriate, throughout the membership year.

7. ***Retaining Personal Data***

- a. Westbury Harriers will retain data only for the period necessary for the expressed purpose of its collection;
- b. The Committee will regularly review the period for which personal data will be retained, having regard to the purpose or purposes of that data;
- c. Personal data will only be held for such period as the subject individual is a member of the club;
- d. Westbury Harriers will securely delete data which is no longer required for its specified purpose;
- e. Information which is no longer accurate or required will be updated, archived or securely deleted.

8. ***The Rights of Individuals***

- a. Personal data will be processed in accordance with the rights of the subject individual under the DPA 1998 and the Human Rights Act 1998, namely:
 - The right of the individual to access a copy of the information comprised in their personal data;
 - The right of the individual to object to processing which is likely to cause or is causing damage or distress;
 - The right of the individual to prevent processing for direct marketing;
 - The right of the individual to object to decisions being taken by automated means;
 - A right in certain circumstances to have inaccurate personal data rectified, blocked, erased or destroyed;
 - A right to claim compensation for damages caused by a breach of the DPA 1998;
- b. Westbury Harriers will provide details of personal information retained by the club on request, within 28 days of the receipt of any notification;
- c. Westbury Harriers will not allow personal information to be used for marketing by any third party;
- d. Westbury Harriers will delete or edit any information following objection, on an individual basis, within 28 days of that objection;
- e. The club will update or delete out of date or inaccurate information within 28 days of any request to do so.

9. ***Information Security***

- a. Westbury Harriers will ensure that a nominated and identified Committee member is responsible for ensuring the security of all data held;
- b. Westbury Harriers will ensure that appropriate physical and technical security measures are in place and that individuals with access to retained personal data have appropriate training;
- c. The Committee will respond to any breach of security swiftly and effectively.

10. ***Sending Personal Data outside of the European Economic Area***

- a. Westbury Harriers will not transfer any member's personal data outside of the European Economic Area.



WESTBURY HARRIERS



BREACHES

1. It is a requirement of the DPA 1998 that any breaches of the Act be referred to the Information Commissioner's Office (ICO), subject to specified statutory exemptions.
2. As a not for profit organisation, Westbury Harriers is exempt from the requirement to self refer to the ICO. However, any breaches will be referred to the Committee, which will consider what, if any, measures are necessary in order to remedy the breach and/or the injured party.

DISCLOSURE OF INFORMATION

Westbury Harriers remains under a duty to respond, in writing and within 21 days, in the event of any written request for information which would have, save for the club's exemption under the duty to refer requirement, been included in the public register.

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