



## OD CUACO CRICKET CLUB PRIVACY POLICY

This privacy policy explains how your personal data will be used and protected and your legal rights in respect of it.

Old Dunstonian Cuaco Cricket Club (“OD Cuaco CC”, “the organisation”, “us, we or our”) is a small local cricket club in the London borough of Bromley. We are the data controller for the purposes of data protection law and can be contacted as follows:

Mail: Old Dunstonian Sports Ground, St Dunstan’s Lane, Beckenham, BR3 3SS Email:

[andyrouse3333@gmail.com](mailto:andyrouse3333@gmail.com)

Website: [www.odcuaco.co.uk](http://www.odcuaco.co.uk)

We are committed to respecting the privacy of our members who entrust us with their personal information. In order to manage the membership, OD Cuaco CC will collect, process, store, transfer, disclose, delete and use your data. Your data may be used internally or shared with a third party in certain circumstances. OD Cuaco CC is committed to being transparent about the use of your data and to meeting its Data Protection obligations.

Persons protected by this policy include: members, junior members’ parents, next of kin / emergency contacts, spectators, volunteers and club officials.

### **What data does the organisation collect?**

The organisation collects and processes a range of information about you. This includes:

- Name, age, date of birth and gender
- Address and contact details, including email address and telephone numbers
- Next of kin / emergency contact details
- School attended and / or cricketing experience
- Information about your nationality and entitlement to be in the UK, including passport and visa details (overseas players)
- DBS checks for those officials and volunteers in a regulated position
- Non-UK vetting form information, including police certificate of good conduct (overseas players)
- Qualifications including coaching, safeguarding and first aid training
- References from other organisations (coaches)
- Details of your subscription and match fee payment details
- Information about medical or health conditions, including whether or not you have a disability for which the organisation needs to make reasonable adjustments
- Accident or incident reports
- Details of any disciplinary or grievance procedures in which you have been involved, including any warnings issued to you and related correspondence

- Allocation of organisation property
- Images through filming, live streaming and photography of matches and training
- Equal opportunities monitoring information, including information about your gender, ethnic origin and disability
- Your consent in relation to any organisation policies.

The organisation collects this information in a variety of ways. For example, data is collected from you through membership forms, from correspondence with you or from documents you have provided such as passports, driving licenses.

In some cases, the organisation collects personal data from you from third parties, with your consent only, such as the Disclosure and Barring Service, ECB or County training bodies etc, references provided by previous clubs.

### **Why does the organisation process personnel data?**

OD Cuaco CC processes data before, during and after the membership relationship for various reasons and relies upon specific lawful reasons for doing so.

It processes data via Consent to enter into a membership relationship with you in order that you may partake in training, matches and social events. It also enables the organisation to process subscriptions and payments due for these activities.

In some cases, the organisation needs to process data to ensure that it is complying with its Compliance obligations. For example, it is required to check visa eligibility for overseas players.

The organisation will process data in your Vital Interest in the event of an emergency when medical information may be given to emergency service personnel.

In other cases, the organisation has a Legitimate Interest in processing data before, during and after the membership relationship. Processing data on this basis allows the organisation to:

- Maintain accurate and up to date membership records and contact details (including details of who to contact in an emergency)
- Process data for DBS checks for any personnel involved in regulated activity with either the junior section or vulnerable adult members in order to achieve and maintain a safe environment and Clubmark or equivalent accreditation
- Operate and keep a record of disciplinary and grievance processes, to ensure acceptable conduct within the organisation
- Register players for league cricket
- Operate and keep a record of members' performance statistics for the presentation of awards and for succession planning of captains and club officers
- Ensure effective general administration
- Provide references on request for current or former coaches
- Respond to and defend against legal claims
- Maintain and promote equality within the organisation
- Provide regular match reports and updates to the club membership
- To market and promote membership of the club to the general public

Where the organisation relies on Legitimate Interest as a reason for processing data, it has considered whether or not those interests are overridden by the rights and freedoms of the individuals affected and has concluded they are not.

Some special categories of personal data such as information about health or medical conditions are

processed for compliance or health and safety reasons.

Where the organisation processes other special categories of personal data, this is done for the purpose of equal opportunities monitoring. Data that is used for this purpose is collected on a voluntary basis, with express consent, is anonymised and there are no consequences for such data not being provided.

### *Filming, Live Streaming and Photography*

The organisation collects data in the form of images via filming, live streaming and photography, for the purposes of coaching, training, marketing, recruitment and to allow supporters of the club to follow matches and club news. A nominated person within the organisation is responsible for ensuring this occurs in a compliant manner and can be contacted via the details given at the beginning of this policy. Permissions for filming, photography and streaming will be checked at least 48 hours in advance of each match and will be available for inspection on request. Cameras will be sited responsibly and spectators and other persons present will be made aware. Permission may be withheld or subsequently withdrawn without it affecting your membership of the club. All members and other attendees are reminded of the responsible sharing of data on social media platforms. Further details can be found in the organisation's Filming, Live Streaming and Photography Policy and Social Media and Online Safety Policy.

### **Who has access to data?**

Your information will be shared internally, including with the coaches, team managers and club officials.

The organisation shares your data with third parties with your consent in order to process Disclosure Barring checks for those in regulated activity or the equivalent checks for overseas players; or to obtain a reference from a previous club. Data may be shared with third parties such as the ECB, the policy, social services (Local Authority Designated Officer) in the event of Safeguarding concerns. The organisation may also share your data with third parties in the event of an accident. In these circumstances, the data will be subject to confidentiality arrangements.

Data is also shared with Teamo via Legitimate Interest in order to facilitate administering the day to day activities of coaching, matches and social events

OD Cuaco CC is an alumni organisation formed by the merger in 2001 of Old Dunstonian Cricket Club and Cuaco (Commercial Union Assurance Company) Cricket Club. We may provide data relating to the provenance of our membership with the Dunstonian Alumni Association and St Dunstan's Education Group.

Your data will not be transferred internationally.

### **How does the organisation protect data?**

Data is stored in a range of different places; databases maintained by the Safeguarding Officer, Coaches, Managers and Membership Secretary; databases maintained by Kent and ECB; the DBS service and other regulatory bodies as required.

OD Cuaco CC takes the security of your data seriously and has measures in place to protect against accidental or unlawful destruction, loss, alteration, unauthorised disclosure or access, and against all other unlawful forms of processing. The security measures applied to the data will be proportional to its sensitivity and potential harm to the individual. For example, there are restrictions on access to certain documents either electronically or physical copies.

## **Data Retention**

The organisation will hold your personal data for the duration of your membership and beyond as necessary. Generally, your details will be kept until the following season in order to allow us to invite you to renew your membership. Some data must be kept for minimum periods for legal reasons as follows:

Legal working / visa checks 2 years

Accident reports 3 years

Health & Safety 3 years (unless latent / hazardous, in which case 40 years)

In the event of no legally prescribed timeframes, data will not be retained for longer than is practically necessary.

## **Your rights**

As a data subject, you have a number of rights. You can:

- Access and obtain a copy of your data on request
- Require the organisation to change incorrect or incomplete data
- Require the organisation to delete or stop processing your data, for example where the details are no longer necessary for the purposes of processing
- Object to the processing of your data where the organisation is relying on its Legitimate Interest as the legal ground for processing
- Ask the organisation to stop processing data for a period of time if data is inaccurate or there is a dispute about whether or not your interests override the organisation's Legitimate Interest grounds for processing data
- Request a copy of your data in a portable form
- Request for your data to be "forgotten"

If you would like to exercise any of these rights, please use one of the forms of contact at the top of this privacy policy.

If you believe the organisation has not complied with your data protection rights, you can complain to the Information Commissioner.

What if you do not provide personal data?

You may have some obligations to provide the organisation with data. In particular, you are required to provide information about criminal records if you wish to be a team captain or coach. Failing to provide the data may mean that you are unable to take up such positions.

Certain information, such as contact and payment details have to be provided to enable the organisation to enter into a membership relationship with you. If you do not provide such information, this will hinder the organisation's ability to administer your membership.

Be advised that certain data is obtained via consent and if you do not wish to provide this or subsequently withdraw consent, you may not be able to continue your membership.

## **Automated decision-making**

No decisions within the organisation are based on automated decision making.