



Data controller: OD Cuaco Cricket Club, St. Dunstan's Lane, Beckenham, BR3 3SS

Data controller Representative: Jo Colby: privacy@odcuaco.co.uk

OD Cuaco Cricket Club ("OD Cuaco CC") is committed to respecting the privacy of our members who entrust us with their personal information. In order to manage the membership, OD Cuaco 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 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, Colts members' parents, next of kin / emergency contacts, and club officials, as well as spouses and/or dependents of employees whose Personal Information has been given to the organisation.

What information does the organisation collect?

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

- your name, age, date of birth, 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 information (overseas players),
- DBS checks for those officials in a safeguarding position,
- Non-UK vetting form information, including police certificate of good conduct,
- qualifications including coaching, safeguarding and first aid training,
- references from other organisations,
- details of your subscription / 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 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 company property;
- equal opportunities monitoring information, including information about your gender, ethnic origin and disability;

The organisation collects this information in a variety of ways. For example, data is collected from you through membership forms; obtained from your passport or other identity documents such as your driving licence; from correspondence with you; or through interviews, meetings or other assessments.

In some cases, the organisation collects personal data about you from third parties, with your consent only, such as documentation received from ECB training providers, references supplied by previous clubs or information from criminal records checks permitted by law.

Data is stored in a range of different places; databases maintained by the Safeguarding Officer and Membership Secretary; and the email contacts of the organisation's officers.

Why does the organisation process personal data?

OD Cuaco 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 us 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 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 personal data before, during and after the end of the membership relationship. Processing employee data allows the organisation to:

- maintain accurate and up-to-date membership records and contact details (including details of who to contact in the event of an emergency),
- process data for criminal record checks for those members who are involved with the Colts section or any vulnerable adult members in order to achieve and maintain Clubmark accreditation;
- to comply with Health & Safety requirements;
- 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 coaching staff;
- respond to and defend against legal claims; and
- maintain and promote equality in the organisation.

Where the organisation relies on legitimate interests as a reason for processing data, it has considered whether or not those interests are overridden by the rights and freedoms of employees or workers and has concluded that they are not.

Some special categories of personal data, such as information about health or medical conditions, are processed to carry out employment law obligations (such as those in relation to members with disabilities and for health and safety purposes).

Where the organisation processes other special categories of personal data, such as information about gender and ethnic origin, 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.

Who has access to data?

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

The organisation shares your data with third parties with your consent in order to obtain criminal records checks from Disclosure and Barring Service, or similar checks relating to overseas players; or to obtain a reference from a previous club. Data may be shared with third parties such as the ECB, the police, 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.

Your data will not be transferred internationally.

How does the organisation protect data?

OD Cuaco takes the security of your data seriously and has measures in place to protect against accidental or unlawful destruction or 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. Documents that may be shared are password protected to prevent unauthorised access.

Where the organisation engages third parties to process personal data on its behalf, they do so on the basis of written instructions, as per the “Standard Clauses” and are under a duty of confidentiality and are obliged to implement appropriate technical and organisational measures to ensure the security of data.

For how long does the organisation keep data?

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 records	3 years (unless 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. For example, next of kin details will be deleted when you tell us you no longer wish to be a member.

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 data is no longer necessary for the purposes of processing;
- object to the processing of your data where the organisation is relying on its legitimate interests as the legal ground for processing; and
- ask the organisation to stop processing data for a period if data is inaccurate or there is a dispute about whether or not your interests override the organisation's legitimate grounds for processing data;
- you have the right to data portability (to receive a copy for other purposes) and;
- the right to be forgotten.

If you would like to exercise any of these rights, please contact privacy@odcuaco.co.uk. You can make a subject access request by completing the organisation's form for making a subject access request <http://www.odcuaco.co.uk/data-privacy.html>

If you believe that 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 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 explicit 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.