





## **SUSSEX COUNTY INDOOR BOWLS ASSOCIATION**

### **PRIVACY NOTICE FOR OUR AFFILIATED MEMBERS**

We are committed to respecting your privacy. This notice is to explain how we may use personal information we collect before, during and after your affiliated membership with us. This applies to you if you have registered to become or are a member of a Sussex County Indoor Bowls club. This notice explains how SCIBA complies with the law on data protection, what your rights are and for the purposes of data protection we will be the registered controller of any of your personal information.

References to **we, our or us** in this privacy notice are to the **Sussex County Indoor Bowls Association (SCIBA)**.

We have **not appointed** a Data Protection Officer to oversee our compliance with data protection laws as we are not required to do so but our County Welfare (Safeguarding & Risk Assessment) Officer and County Secretary has overall responsibility for data protection compliance in our organisation. Contact details are set out in the "Contacting us" section at the end of this privacy notice.

#### **1. PERSONAL INFORMATION WE MAY COLLECT FROM YOU**

Depending on the type of Affiliation you register for with us, you may initially provide us with or we may obtain personal information about you.. such as information regarding your: -

- o personal contact details that allows us to contact you directly such as name, title, email addresses and telephone numbers;
- o date of birth;
- o gender;
- o affiliated club membership start and end date;
- o references and other information included in a CV or cover letter or as part of the application process for club membership;
- o records of your interactions with us such as telephone conversations, emails and other correspondence and your instructions to us;
- o use of and movements through our online portal, IP addresses, user names and other IT system identifying information;
- o records of your attendance at any events (matches, games, meetings) hosted by SCIBA;
- o CCTV footage and other information obtained through electronic means such as swipecard and key fob records;
- o images in video and/or photographic form and voice recordings;
- o details of any county club membership;
- o details of next of kin, family members, coaches and emergency contacts;
- o records and assessment of any player rankings, grading or ratings, competition results, details regarding events/matches/games attended and performance (including that generated through player pathway programme);
- o any disciplinary and grievance information;
- o medical flags, allergies, blood type, religious indicators as to medical emergency.
- o Personal cheques paid to SCIBA for various concerns, competitions, affiliation subscriptions, county Annual Patrons subscriptions, match fees, green fees, transportation related costs.

## 2. SPECIAL CATEGORIES OF PERSONAL INFORMATION

We may also collect, store and use the following “special categories” of more sensitive personal information regarding you:

- information about your race or ethnicity, religious beliefs and sexual orientation;
- information about your health, including any medical condition, health and sickness records, medical records and health professional information; and
- biometric information about you, for example fingerprints, retina scans (as new technology permits).

We may not collect all of the above types of special category personal information about you. In relation to the special category personal data that we do process we do so on the basis that

- the processing is necessary for reasons of substantial public interest, on a lawful basis;
- it is necessary for the establishment, exercise or defence of legal claims;
- it is necessary for the purposes of carrying out the obligations and exercising our or your rights in the field of social protection law; personal risk assessment; SCIBA related liabilities aligned with affiliation and membership rights.
- based on your explicit consent.

In the table below we refer to these as the “special category reasons for processing of your personal data”.

## 3. WHERE WE COLLECT YOUR INFORMATION

We typically collect personal information about our members when you apply to become an affiliated member of a SCIBA indoor bowls club, you or your club register your details with us at [www.sciba.net](http://www.sciba.net), when you acquire any services we offer, when you make a query and/or complaint or when you correspond with us by telephone, e-mail or in some other way.

We also may collect personal information about you from any third party references you provide as part of the application process for club membership or SCIBA Affiliation status.

If you are providing us with details of referees, medical contacts, next of kin, beneficiaries, family members and emergency contacts they have a right to know and to be aware of what personal information we hold about them, how we collect it and how we use and may share that information. Please share this privacy notice with those of them whom you feel are sufficiently mature to understand it. They also have the same rights as set out in the “Your rights in relation to personal information” section below.

#### 4. USES MADE OF THE INFORMATION

The table below describes the main purposes for which we process your personal information, the categories of your information involved and our lawful basis for being able to do this.

Purpose	Personal information used	Lawful basis
To administer any membership you have with us and managing our relationship with you, including dealing with payments and any support or service enquiries made by you.	All contact and membership details, transaction and payment information, records of your interactions with SCIBA.	This is necessary to enable us to properly manage and administer your affiliated membership contract with SCIBA.
To arrange and manage any contracts for the provision of any SCIBA service.	Contact details, transaction and payment information. Records of your interactions with SCIBA.	This is necessary to enable us to properly administer and perform any contract for the provision of services your Affiliation to the County Association may require.
To send you information which is included within your membership benefits package, including details about, competitions and events, EIBA offers and any updates on indoor bowls in Sussex & elsewhere.	Contact and membership details.	This is necessary to enable us to properly manage and administer your affiliation membership contract with SCIBA.
To send you other indoor bowls information we think you might find useful or which you have requested from SCIBA including any newsletter, information about membership, events, competitions, website material and details about our partners such as the English Indoor Bowls Association (EIBA Ltd) and Home Counties Indoor Bowls Association (HCIBA).	Contact details and Competition preferences and information.	Where you have given SCIBA your explicit consent to do so. The management and administration of EIBA and HCIBA concerns that affect SCIBA Affiliated members.
To answer your queries or complaints	Contact details and records of your interactions with SCIBA	We have a legitimate interest to provide complaint handling services to you in case there are any issues with your Affiliation.

<p>Secure retention of records for the period of your Affiliation to SCIBA</p>	<p>All the personal information we collect.</p>	<p>We have a legitimate interest in retaining records whilst they may be required in relation to complaints or claims. We need to retain records in order to properly administer and manage your membership and run our club and in some cases we may have legal or regulatory obligations to retain records.</p> <p>We process special category personal data on the basis of the “special category reasons for processing of your personal data” referred to in section 2 above.</p>
<p>The security of our IT systems</p>	<p>Your usage of our IT systems and online portals.</p>	<p>We have a legitimate interest to ensure that our IT systems are secure.</p>
<p>To conduct data analytics studies to better understand event attendance and trends within the indoor sport in Sussex County.</p>	<p>Records of your attendance at any events or competitions hosted by SCIBA.</p>	<p>We have a legitimate interest in doing so to ensure that our affiliated membership is targeted and relevant.</p>
<p>For the purposes of promoting the county, club, SCIBA events and affiliated membership packages.</p>	<p>Images in video and/or photographic form.</p>	<p>Where you have given us your explicit consent to do so.</p>
<p>To comply with health and safety requirements</p>	<p>Records of attendance, CCTV footage and other information obtained through electronic means such as swipecard and key fob records, medical information about your health [biometric information about you, for example fingerprints, retina scans]</p>	<p>We have a legal obligation and a legitimate interest to provide you and other members of our organisation with a safe environment in which to participate at indoor bowls.</p> <p>We process special category personal data on the basis of the “special category reasons for processing of your personal data” referred to in section 2 above. Where required we shall first obtain your personal consent to do so. Biometric information may be gathered as new technology allows but use will be by prior consent to do so.</p>
<p>To administer your attendance at any courses or programmes you sign up to</p>	<p>All contact and membership details, transaction and payment data.</p>	<p>This is necessary to enable us to register you onto and properly manage and administer your attendance on the course and/or programme.</p>

	Details of any county affiliated membership and performance data.	
To arrange for any trip or transportation to and from an event	Identification documents details of next of kin, family members and emergency contacts, transaction and payment information, health and medical information only where necessary.	This is necessary to enable us to make the correct arrangements for the trip and/or transportation to an event.  We process special category personal data on the basis of the "special category reasons for processing of your personal data" referred to in section 2 above. If we need your personal consent we shall obtain it first.
To use information about your physical or mental health (including any injuries) or disability status, to ensure your health and safety and to assess your fitness to participate in any events or activities SCIBA host and to provide appropriate adjustment to our sports facilities.	Health and medical information	We process special category personal data on the basis of the "special category reasons for processing of your personal data" referred to in section 2 above. If we need your personal consent we shall obtain it first.
To gather evidence for possible grievance or disciplinary hearings	All the personal information we collect	We have a legitimate interest in doing so to provide a safe and fair environment for all our members and to ensure the effective management of any disciplinary hearings, appeals and adjudications.  We process special category personal data on the basis of the "special category reasons for processing of your personal data" referred to in section 2 above. For criminal records history we process it on the basis of legal obligations or on your explicit consent. Where we need your prior consent it will be obtained first.
For the purposes of equal opportunities monitoring	Name, title, date of birth gender, information about your race or ethnicity and health and medical information	We have a legitimate interest to promote a sports environment that is inclusive, fair and accessible.  We process special category personal data on the basis of the "special category reasons for processing of your personal data" referred to in section 2 above.

To comply with legal obligations, for example, regarding people working with children or vulnerable adults to comply with our safeguarding requirements	Information about your criminal convictions and offences	For criminal records history we process it on the basis of legal obligations or else it is based on your explicit consent.

For some of your personal information you will have a legal, contractual or other requirement or obligation for you to provide us with your personal information. If you do not provide us with the requested personal information we may not be able to admit you as an affiliated SCIBA member or we may not be able to properly perform our contract with you or comply with legal obligations and we may have to terminate your affiliation. For other personal information you may not be under an obligation to provide it to SCIBA but if you do not provide it then we may not be able to properly perform our contract with you.

Where you have given us your consent to use your personal information in a particular manner you have the right to withdraw this consent at any time... which you may do by contacting us as described in the "Contacting us" section below.

Please note, however, that the withdrawal of your consent will not affect any use of the data made before you withdrew your consent and we may still be entitled to hold and process the relevant personal information to the extent that we are entitled to do so on criteria other than your consent. Withdrawing consent may also have the same effects as not providing the information in the first place... for example we may no longer be able to provide certain affiliated member benefits to you.

**5. DIRECT MARKETING**

Email, post and SMS marketing: from time to time, we may contact you by email, post or SMS with information about bowls services we believe you may be interested in.

SCIBA will only send marketing messages to you in accordance with the marketing preferences you set. You can then let us know at any time that you do not wish to receive marketing messages by completing this form link/emailing us at [secretary@sciba.net](mailto:secretary@sciba.net). You can also unsubscribe from our marketing by clicking on the **unsubscribe link** in the marketing messages we send to you.

**6. DISCLOSURE OF YOUR PERSONAL INFORMATION**

SCIBA share personal information with the following parties: -

- o Any party approved by you.
- o To any governing bodies or regional bodies for the sports covered by our Association: to allow them to properly administer the sports on a local, regional and national level.
- o Our commercial partners: for the purposes of providing you with information on any tickets, special offers, opportunities, products and services and other benefits provided by our commercial partners where you have given your express consent for us to do so;
- o The Government or our regulators where we are required to do so by law or to assist with their investigations or initiatives.
- o Police, law enforcement and security services to assist with the investigation and prevention of crime and the protection of national security.
- o SCIBA Sponsors and Advertisers with your direct consent only.

## 7. TRANSFERRING YOUR PERSONAL INFORMATION INTERNATIONALLY

The personal information we collect is not transferred to or stored in countries outside of the UK.

## 8. HOW LONG DO WE KEEP PERSONAL INFORMATION FOR?

The duration for which we retain your personal information will differ depending on the type of information and the reason why we collected it from you. However, in some cases personal information may be retained on a long-term basis: for example, personal information that we need to retain for legal purposes will normally be retained in accordance with usual administrative practice and regulatory requirements. Generally, where there is no legal requirement we retain all physical and electronic records for a period of FIVE {5} years after your last contact with SCIBA or the end of your affiliated membership. Exceptions to this rule are:

- CCTV records which are held for no more than 30 days unless we need to preserve the records for the purpose of prevention and detection of crime;
- Details regarding unsuccessful membership applicants where we hold records for a period of not more than TWELVE {12} months;
- Information that may be relevant to personal injury or discrimination claims may be retained until the limitation period for those types of claims has expired. For personal injury or discrimination claims this can be an extended period as the limitation period might not start to run until a considerable time after the event.

It is important to ensure that the personal information we hold about you is accurate and up-to-date, and you should let SCIBA know if anything changes, for example if you change your home address, telephone number, mobile number or email address or if you have a medical flag to tell us about that we have no previous knowledge of. You can contact SCIBA by using the details set out in the "Contacting us" section below.

## 9. YOUR RIGHTS IN RELATION TO PERSONAL INFORMATION

You have the following rights in relation to your personal information: -

- the right to be informed about how your personal information is being used;
- the right to access the personal information we hold about you;
- the right to request the correction of inaccurate personal information we hold about you;
- the right to request the erasure of your personal information in certain limited circumstances;
- the right to restrict processing of your personal information where certain requirements are met;
- the right to object to the processing of your personal information;
- the right to request that we transfer elements of your data either to you or another indoor bowls authority;
- the right to object to certain automated decision-making processes using your personal information.

You should note that some of these rights, for example the right to require us to transfer your data to another indoor bowls authority or the right to object to automated decision making may not apply as they have specific requirements and exemptions which apply to them and they may not apply to personal information recorded and stored by SCIBA. For example, we do not use automated decision making in relation to your personal data. However, some have no conditions attached so your right to withdraw consent or object to processing for direct marketing are **absolute rights**.



Whilst this privacy notice sets out a general summary of your legal rights in respect of personal information this is a very complex area of law. More information about your legal rights can be found on the Information Commissioner's website at <https://ico.org.uk/for-the-public/>

To exercise any of the above rights or if you have any questions relating to your rights please contact us by using the details set out in the "Contacting Us" section below.

If you are unhappy with the way we are using your personal information you can also complain to the UK Information Commissioner's Office or your local data protection regulator.

We are here to help and encourage you to contact SCIBA to resolve your complaint first.

**SCIBA is registered with the Information Commissioners Office (ICO). Registration Number: ZA319202**

## 10. CHANGES TO THIS NOTICE

SCIBA may update this privacy notice from time to time. When we change this notice in a material way, we will update the version number and date at the bottom of this page. For significant changes to this notice SCIBA will try to give you reasonable advance warning unless we are prevented from doing so. Where required by law SCIBA will seek your consent to changes in the way we use your personal information.

## 11. CONTACTING US

In the event of any query or complaint in connection with the information SCIBA hold about you please email [secretary@sciba.net](mailto:secretary@sciba.net) or write to SCIBA at: Andrew Brown, Hon. SCIBA Secretary, Arun District IBC, Nyewood Lane, Bognor Regis, PO21 2TT Telephone: 01243 866261

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*In the interim (period leading up to the 12<sup>th</sup> June, 2018) please direct your inquiries to: Tony Phillips, Hon. SCIBA Secretary, Sea Barn, The Warren, Ferring, BN12 5PQ ..Telephone: 01903 248049 or email: [secretary@sciba.net](mailto:secretary@sciba.net)*

*Alternatively contact the SCIBA County Welfare & Compliance Officer via contact information on the SCIBA website ([www.sciba.net](http://www.sciba.net))*

*After the 12<sup>th</sup> June 2018 direct all inquiries to my successor Mr.Andrew Brown at Arun District IBC as above.*

**Version 2.0 dated: 25<sup>th</sup> May, 2018**