



# Data Protection Policy

## Introduction and Purpose

This document records HLTC's policy in respect of how it complies with the requirements of the Data Protection Act 1998 ("the Act"). The policy is based on guidance from the Information Commissioners Office (ICO) and other sources.

For the purposes of this policy the Committee comprises the Officers of HLTC plus the Business Manager.

This Policy shall be included in HLTC's website and be available in a folder in the HLTC clubhouse.

## Sensitive Personal Data

HLTC shall not collect data which is defined by the Act as sensitive personal data ie data relating to racial or ethnic origin, political opinions, religious and other beliefs, trade union membership, physical and mental health or condition, sexual life, commission or alleged commission of an offence and proceedings relating to such an offence.

## Data Collected and Purpose

Data collected shall be limited to

1. For membership administration purposes: Each member's name, address and telephone number(s), email address(es) and, where required to enable entry into an age-limited category of membership (eg senior citizen or junior), the member's date of birth
2. For business administration purposes: the date of birth of all Committee Members shall also be collected for the purposes only of registering those Members with Companies House as Directors of HLTC LLC, and with the Charity Commission as Trustees of HLTC the charity. Data required to be collected to enable HLTC officials to use the LTA Clubspark system may also be collected.

Only HLTC Committee Members shall have access to such data and they shall only use the data only for the following purposes:

1. Determining a members eligibility for an age-limited membership category (Senior or Junior)
2. Maintaining a contact list that enables HLTC to issue newsletters and other club communications (be they in printed or electronic form)
3. Recording and knowing who is a current member of HLTC and in which membership category
4. Complying with statutory requirements in respect of Company and Charity Law
5. Registering for and operating selected modules of the LTA Clubspark system.

## **Data Relating to Membership Categories**

From time to time the Committee may be required to consider an individual's ability to participate in any particular category of membership (eg beginner, improver, upgraded junior etc). The opinions and Committee deliberations about that individual's ability may constitute personal data; the record of discussions regarding any Committee Meeting where such data is shared among the Committee (plus the Head Coach who may be in attendance) shall not appear in any copy of the record made available to club members or others in general and shall be confined to a version of the record issued to and accessible only by the Committee and Head Coach. Such records shall be protected in the same way as other data, as specified in the paragraph below.

## **Protection of Personal Data**

HLTC shall be entitled to rely upon Companies House and the Charities Commission systems giving adequate protection to data that HLTC provides about the Directors and Trustees, and the LTA's systems about Committee Members or other HLTC officials operating the LTA Clubspark system, and HLTC members' data should HLTC choose to use the Clubspark Membership module for membership management.

HLTC shall limit the distribution of passwords and other login information required to access the Companies House, Charity Commission and LTA systems only to Committee Members who require such access to perform specific functions

Membership data may be stored on a database which itself may be stored in a commercial cloud storage (such as Google) and/or on a personal computer accessed only by the Membership Secretary and/or in the LTA-sponsored Clubspark membership management module. Each of these, when used, shall have access management including a password; the access details may be shared only among those HLTC Committee Members requiring access to perform specific functions.

Completed membership forms may be stored by the Membership Secretary for up to 1 year and then destroyed.

The Membership Secretary shall, by end December each year, erase all data relating to a member who has not renewed their membership in that year.

## **Data Transfer to Third Parties**

No data collected by HLTC shall be transferred by any means to any other organisation except as follows:

1. Data pertaining to Directors of HLTC LLC which is required to be lodged with Companies House
2. Data pertaining to the Trustees of the charity HLTC which is required to be lodged with the Charities Commission
3. Data which is required to register an HLTC Committee member or other official as a user of the LTA Clubspark system
4. Individual members' details held in the LTA Clubspark system should HLTC decide to use the Clubspark Membership module for membership administration.

## Privacy Statement

The Membership form shall include a privacy statement indicating to members that HLTC will collect information, and the purposes of that collection, and direct members to this Policy for detail.

## Subject Access Requests

The Act gives any person a right to request a copy of all data that an organisation has about them. HLTC shall supply to any member, and within the 40 days allowed by the Act, all data held about that subject. If an access request is received from a former member the Membership Secretary shall confirm that all that former members data has been erased. HLTC is allowed to charge up to £10 to provide this data but current policy is not to charge.

## Data Controller

The Act requires any organisation which processes personal data to have a Data Controller; according to ICO guidance **Data controller** means " ... a person who (either alone or jointly or in common with other persons) determines the purposes for which and the manner in which any personal data are, or are to be, processed". Notwithstanding that statement the same guidance also states:

A data controller must be a "person" recognised in law, that is to say:

- individuals;
- organisations; and
- other corporate and unincorporated bodies of persons.

Data controllers will usually be organisations, but can be individuals, for example self-employed consultants. Even if an individual is given responsibility for data protection in an organisation, they will be acting on behalf of the organisation, which will be the data controller.

HLTC policy is to recognise the HLTC is itself a Data Controller whose functions are executed through decisions made and actions taken by its Committee.

## Data Protection Officer

The HLTC Business Manager will oversee application of this policy and be the point of contact for, and respond to, Subject Access Requests on behalf of the Data Controller.

## Policy Approval

The HLTC Committee approved this policy ex-committee in November 2016.