



## WINCHESTER HOCKEY CLUB – DATA PRIVACY

Winchester Hockey Club is committed to respecting your privacy.

This notice is to explain how we may use personal information we collect before, during and after your membership with us. This notice explains how we comply with the law on data protection, what your rights are and for the purposes of data protection we will be the controller of any of your personal information.

This notice applies to you if you are either:

1. an individual player/participant of hockey who has registered his/her interest in participating in the sport competitively and/or whose details we have collected through completion of our member registration form on the Teamo App membership database.
2. a coach, team manager, teacher, technical official or umpire who has registered for membership or completed their volunteer helper application.

References to **WHC, we, our** or **us** in this privacy notice are to Winchester Hockey Club

We have appointed a Data Protection Officer to oversee our compliance with data protection and that person will be the Club Membership Secretary ( [membership@winchesterhc.co.uk](mailto:membership@winchesterhc.co.uk) )

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

When you sign up for membership with us, you may provide us with or we may obtain **personal information** about you, such as information regarding your:

- personal contact details that allows us to contact you directly such as name, title, address, email addresses and telephone numbers;
- date of birth;
- gender;
- records of your participation at any training session, game or competitions representing us, or club organised social event;
- images in video and/or photographic form; and
- marketing preferences so that we know whether and how we should contact you.

### Players/Participants

If you are a player/participant who has registered his/her interest in participating in the sport competitively, you may also provide us with or we may obtain the following **additional personal information** from you:

- details of next of kin and emergency contacts;



## Coaches and officials (including Team Managers and Teachers)

If you have registered with us as a Team Manager or Coach, you may also provide us with or we may obtain the following **additional personal information** from you:

- any coaching code or official number;
- your current affiliated club or other organisation (if applicable);
- coaching/teaching qualification and/or officiating history and any player rating (if any);
- accreditation/qualification start and end date;

## 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;
- information about your health, including any medical condition, health and sickness records, that you have provided to us;

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, 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 employment and social security and social protection law;
- it is necessary to ensure Coaches, Team Captains or Managers have visibility of essential medical information provided by you should accident or emergency occur during a hockey session or match requiring assistance; or
- 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 register as a member, manager or coach as part of Winchester Hockey Club through our Teamo membership application software site, and to a lesser extent from initial enquiries through our website.

Your data is securely held within the Teamo Application database and application software. Teamo is an England Hockey approved sport membership application software business owned by SportsPlan Ltd, and you are responsible for entering and maintaining your personal data within this application. Teamo will not use your information other than to contact you in response to your initiated support call or message.

The Teamo App may access your location services of your mobile device to assist in the provision of things like directions to a venue, and you can control this through your mobile preferences by turning off those services using your mobile device's built-in settings.

Due to the Covid-19 regulations we will also use Teamo technology to record your attendance at specific grounds, matches and events utilising the Teamo generated QR code registration





system. This information (all attendees) has to be reported to England Hockey within 24 hours, but this data is deleted by both ourselves and EH after 21 days unless it has had to be passed onto the NHS trackandtrace group following confirmation and notification of a covid infection incident.

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 account(s) you have with us and managing our relationship with you, including covering you for any insurance (through the club's policy)	All contact and membership details, transaction and payment information, records of your interactions with us, and marketing preferences	This is necessary to enable us to properly manage and administer your membership with us.
To send you information which is included within your membership benefits package, including details about advanced ticket information, competitions and events and any updates on WHC.	All contact and membership details	This is necessary to enable us to properly manage and administer your membership contract with us.
To send you other marketing information we think you might find useful or which you have requested from us, including our newsletters, information about Membership, and events.	All contact and membership details	Where we believe we have a legitimate interest to keep you up to date with events in WHC or where you have given us your explicit consent to do so.
Retention of records	All the personal information we collect	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 in some cases, we may have legal or regulatory obligations to retain records. 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.
The security of our IT systems.	In common with most databases are kept secure by the Data Protection Officer and disclosed to club officials via encrypted transfer methods.	We have a legitimate interest to ensure that our IT systems are secure, and to protect both you and ourselves from online fraud
To comply with health and safety requirements	Records of attendance	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 in sport.



		This includes sharing this data with England Hockey as a requirement of the Covid-19 pandemic trackandtrace requirements
Provide assistance to you in case of accident or illness	Reference to the medical information you have provided	We have a legitimate interest in wishing to help and assist you if needed.
To manage the purchase of event tickets, and payment of match fees, membership fees and the like	The financial transaction records are retained within the database (but all confidential payment card data remains invisible)	We have a legitimate interest to track payment records against obligations and to provide this information by making it visible to the respective member

### **Data retention.**

Each year you will be asked to renew your declarations and update your information needed if you wish to remain a member of the club – typically in June.

If you do not wish to remain a Member, (and in fact choose to leave the club) you must advise the membership secretary, and your data will be deleted after a period of 12 months. (This time period enables us to comply with the necessary financial record keeping and attendance or participation records).

If you are leaving and wish to remove your special categories of personal information this can be achieved by contacting the membership secretary.

If we receive no response, and no membership fee has been paid or is due, and all dues are paid, your record will be deleted after 12 months.

A member may wish to stop playing, but remain as a non playing member, and can make the request of the membership secretary to facilitate this.

## **4. 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 request access to the personal information we hold about you; Utilising the Teamo membership system you can see and provide update or change to the information you have provided to us.
- the right to request the correction of inaccurate personal information we hold about you; NB: utilising the Teamo membership system you can see and provide update or change to the information you have provided to us.
- the right to request the erasure of your personal information in certain limited circumstances; please contact the membership secretary.
- 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;

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 us to resolve your complaint first.

## 5. INFORMATION SECURITY

Your information provided will not be provided to any third-party organisations without your prior express consent, with the exception of the following:-

- Under the England Hockey Covid-19 pandemic back to hockey regulations, we are obliged to record attendance of all members for all Club matches, training sessions, and events, recording your contact information, and supplying this to England Hockey within 24 hours. Under these regulations both they and us will not hold this information beyond 21 days, whereupon it will be deleted. The purpose of this information is to release to NHS TrackandTrace should there be a covid contact experience affecting an event.
- In addition, provision of names and dates of birth where required by league or England Hockey competitions will be supplied from this information provided.
- With regard to information on ethnicity, only de-personalised club-wide total demographic numbers are provided to England Hockey as outlined in the membership application form.

## 6. WHO CAN SEE YOUR DATA

Your data is visible to the membership secretaries (Senior and Junior), the Treasurer, Secretary and Chairman of the club in order to facilitate the management and running of the club, and the membership secretaries have the responsibility review the data and to ask our Members to keep their data completed and up-to-date.

- Contact data and age for U18 members is not visible to any club personnel, and all communication to under 18's is direct with Guardian Parents who are always copied in. Junior members medical or parent guardian contact information is available and visible to the nominated lead coach(s) and or Team manager(s) of their respective age group team.
- Captain's, team managers and lead coaches of all adult group teams have visibility of health and emergency contact information for the players within their groups, and Club Captains & Junior Chair have similar visibility across the whole of their respective sections to facilitate the same – management of team or group activities including fixtures, selection, match fee payment, membership progression, attendance registers and registration with England Hockey to comply with Covid regulations.



- People within the same groups (a team, all coaches, the committee etc) can see the names with all others in the same group, and can message them and make posts, but cannot see their contact or other data – this is all standard data control within the Teamo App.

Any queries regarding access should be directed to the respective membership secretary.

## 7. CONTACTING US

In the event of any query or complaint in connection with the information we hold about you, please email [membership@winchesterhockey.co.uk](mailto:membership@winchesterhockey.co.uk) or [juniormembership@winchesterhc.co.uk](mailto:juniormembership@winchesterhc.co.uk)

*Any changes we may make to this privacy policy in the future will be posted on this page, and the issue date updated. We encourage you to check this privacy policy from time to time for any updates or changes to the privacy policy. If we would like to use your previously collected personal data for different purposes than those we notified you about at the time of collection, we will provide you with notice and, where required by law, seek your consent before using your personal data for a new or unrelated purpose. We may process your personal data without your knowledge or consent where required by applicable law or regulation.*

12<sup>th</sup> August 2020