Portishead & Clevedon Triathlon Club (PAC-Tri) information and policy regarding the General Data Protection Regulation 2018

Background

The General Data Protection Regulation comes into force on May 25th 2018. This puts greater controls for those that hold data about people to let those people know you hold that information and who you share it with. Reasonable precautions to protect the privacy of the data are required to be demonstrated through process documentation. Failure to reasonable protect or share with intent both comes with heavy fines as well as reputational damage. Either or these in extreme cases could cause the club to close.

Purpose of this document

This document will be made available to all club members and race entrants prior to joining or entering an event organised by PAC-Tri. Those people who do not wish to share their data in line with this document must not join the club or enter our events or training sessions.

Document Control

This document will be approved by the club committee and reviewed each year to keep in compliance. Should the club be made aware of short comings within this document between meetings it will be reviewed and updated by the committee and information about the update posted on the PACT-Tri web page and Facebook page.

Date	Version	Author	Description	Status
July 2018	0.1	Pat Garland Club Chairman	Copy to be shared with committee with correction to be made prior to presentation at next committee meeting	Draft

Useful External References

No.	Description	Location
1	Guidance to Triathlon Clubs relating to GDPR	https://ico.org.uk/media/1624219/preparing-for-the-gdpr-12-steps.pdf https://www.britishtriathlon.org/news/is-your-club-gdpr-ready%3F-_8034
2	British Cycling GDPR and Data Protection advice	https://www.britishcycling.org.uk/privacynotice

3	Guidance from the Information Commissionaires' office	https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/

Document Usage

This document is to be made available to all club members and race entrants and form part of the terms and conditions of membership, race entry and guests at any of our sessions or events.

Security of Data held that is not publicly shared

PAC-Tri is a voluntary organisation and employs no staff or contractors to manage security relating to personal data. The data is held on volunteers' personal devices although only committee members will have access to this data and the data will be password protected. This must be taken into account by those joining the club, entering our events or being guests at our events.

The Club secretary and Chairman will jointly include the role of the data protection officer and be reviewed annually. It is the responsibility of the club secretary and Chairman to review compliance, ensure the policy is kept up to date and can be referenced by those who enter our events or join our club.

Notification of data breach

From the ICO website as in reference 3 we do not need to report data breaches to the ICO as we do not hold information that is considered to "result in physical, material or non-material damage to natural persons such as loss of control over their personal data or limitation of their rights, discrimination, identity theft or fraud, financial loss, unauthorised reversal of pseudonymisation, damage to reputation, loss of confidentiality of personal data protected by professional secrecy or any other significant economic or social disadvantage to the natural person concerned"

However, we must record any data breach, contact the people concerned and review our procedures to prevent repeats of such a breach.

Should anyone become aware of a data breach they must report to the Club Secretary or Club Chair. The club will identify what data has been breached and regarding whom. Those affected will be notified within 30 days or sooner where possible. Any reporting to the Information commissioner's Office will be the priority in order to seek further advice as appropriate. The notification will be performed by officers of the club in the following order as they are available 1, Club Secretary; 2 Club Chair; 3 Club Treasurer.

Personal data held

We only hold data in order to manage the club and events it organises. For this reason, we hold the following information about members and those who enter our events. Currently we hold no information regarding children under 16. Should this change in the future we will also hold the same data regarding their parent/guardian and the relationship to the person under 16.

Membership Details

We hold the following information on all club members from the members registration as provided by the member at that time. We hold no information relating to credit or debit cards.

- First Name
- Last Name
- E-Mail Address
- Telephone number
- Address
- Emergency contact name
- Emergency contact telephone number
- Medical conditions that may impact on the club or club members
- Bike insurance details

Members Race Results

We may also hold information on events people have entered and how they have performed for our club. This information may be posted on our Facebook page and may be visible to non-members.

- Name
- Event
- Event Date
- Time
- Position in Age/gender group

Participants of our events

Although there is no formal entry to club events, members are asked to use Doodle to register an interest in club events. Images of members may be posted on our Facebook page after the events have taken place. The information asked for is below.

- First Name
- Last Name

Images of guests at club events

We will publicly share images of people and club events to promote the club or the event. We will also publish pictures of people taking part in events not organised by the club.

Data Shared with other organisations

We may share club members details with the organisations we are affiliated to such as the British Triathlon Federation or its country components and British Cycling as requested by them without further informing the club member other than through this policy document. We will also share on a request basis that information required by an event organiser or emergency services where the member has entered the event and we understand it is in the best interest to share that data. We will not share without request or sell our members data.

Data shared Publicly

We may share publicly the following member and race entrant details

- First Name
- Last Name
- Events they have completed

- Date of the event
- Time to complete the event or completion status (eg DNS, DNF)
- Race gender/age category
- Their image to promote the club or the event. We will not share images where we are aware they may be embarrassing or cause offense.

Correction, review of data and removal of images

Images

Best efforts will be made to remove these images on request as can be expected by a voluntary organisation without staff. We aim to complete 90% of removal requests within 7 days and 100% of removal requests within 30 days. As these images could have been copied and distributed by other people during this time we cannot remove copies we no longer have control of.

Correction of data

Best efforts will be made to correct data on request as can be expected by a voluntary organisation without staff. We aim to complete 90% of correction requests within 7 days and 100% of corrections within 30 days. As some data could have been copied and distributed by other people during this time we cannot remove copies we no longer have control of.

Review of data held

Requests to review data held should be made to the club secretary and escalated to the club chair and Club Treasurer if no response within 16 days. We aim to satisfy all requests for information held about a person within 30 days.

Retention of data held

The club will remove data on individuals within 12 months of their membership expiring.