

# Benitachell Bowls Club

## PRIVACY NOTICE FOR OUR 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 membership with us. This notice applies to you if you have registered to become or are a member of our club. 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.

References to **we**, **our** or **us** in this notice are to: **Benitachell Bowls Club, NIF: G03327160, FBCV No 1276**

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 Board Members will be responsible for Data Protection Compliance. Our Membership Secretary is designated "Data Processor" for all personal information relating to club membership. Our Website Manager is designated "Data Processor" for all personal information held on the website. 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 membership you register for with us, you may initially 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, email addresses and telephone numbers;
- date of birth;
- gender;
- membership start and end date;
- Records of your interactions with us such as emails, other correspondence and your instructions to us;
- any payment details you provide so that we can receive payments from you, and details of the financial transactions with you;
- use of, and movements through, our online portal and website; passwords, IP addresses, user names and other system identifying information;
- records of your attendance at any events hosted by us;
- **Photographs to celebrate achievements and promote club activities**
- your email preferences so that we know whether and how we should contact you.
- identification documents such as passport and identity cards;
- details of any provincial or regional membership;
- details of next of kin or emergency contacts;
- records and assessment of any player rankings, grading or ratings, competition results, details regarding events/matches/games attended and performance;
- any disciplinary and grievance information;

### 2. **WHERE WE COLLECT YOUR INFORMATION**

We typically collect personal information about our members when you apply to become a member of the bowls club, or you register an account with us at: [benitachellbowlsclub.com](http://benitachellbowlsclub.com) or when you make a query and/or complaint or when you correspond with us by phone, e-mail or in some other way.

If you are providing us with details of referees, 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 who 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.

### 3. **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
<b>To administer your membership with us and manage our relationship with you, including dealing with payments and support enquiries made by you</b>	All contact and membership details, transaction and payment information, records of your interactions with us.	This is necessary to enable us to properly manage and <b>administer your membership contract with us</b> .
<b>To send you information including details about competitions and events, newsletters and any updates on <i>Bowls Club matters</i></b>	Contact and membership details.	This is necessary to enable us to properly manage and <b>administer your membership contract with us</b> .
<b>To answer your queries or complaints</b>	Contact details and records of your interactions with us	We have a <b>legitimate interest</b> to provide complaint handling services to you in case there are any issues with your membership.
<b>Retention of records</b>	All the personal information we collect.	We have a <b>legitimate interest</b> 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 <b>legal or regulatory obligations</b> to retain records.
<b>The security of our IT systems</b>	Your usage of our online portals and website.	We have a <b>legitimate interest</b> to ensure that our IT systems are secure.
<b>For the purposes of promoting the club, our events and its membership.</b>	Images in video and/or photographic form, and limited membership details.	Where you have given us your <b>explicit consent</b> to do so.
<b>Paying you for any out of pocket expenses</b>	Transaction and payment information.	We need this information to make any out of pocket expense payments to you.
<b>To administer your attendance at any courses, competitions or programmes you sign up to.</b>	All contact and membership details, transaction and payment data.	This is necessary to enable us to register you on, and properly manage and administer your attendance on the competition, course or programme.
<b>To arrange for any trip or transport to and from an event</b>	Identification documents, details of next of kin and emergency contacts, transaction and payment information.	This is necessary to enable us to make the necessary arrangements for the trip and/or transportation to an event.
<b>To gather evidence for possible grievance or disciplinary hearings</b>	All the personal information we collect	We have a <b>legitimate interest</b> in doing so to provide a safe and fair environment for all members and to ensure the effective management of any disciplinary hearings, appeals and adjudications.
<b>To publish membership welfare information</b>	Limited personal information	Where you have given us your <b>explicit consent</b> to do so.

## **Notes:**

**Images & Video.** Occasionally the club will take photographs of activities to record events and use them later on Social Media and the Club's website to promote the club within the wider community.

The Club also takes photographs showing members achievements either individually, in groups or in teams. These photographs are used to celebrate achievement and may be posted on Social Media and on the Website together with the winner's names; if members do not wish to be included in any photographs they should take some responsibility by informing the photographer and stepping out of the group whilst the photograph is taken.

Video footage may also be displayed on the clubs website, and to show the condition of the playing surface. This may also occur whilst members are present.

Any member opting out of sharing some or all of their personal information must be aware that this may prevent them from participating in club activities such as internal competitions, league and open competitions.

**Personal Information.** 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 a club 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 membership.

For other personal information you may not be under an obligation to provide it to us, but if you do not provide it then we may not be able to properly perform our contract with you.

**Right to withdraw consent.** Where you have given us your explicit 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 bases 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 the benefits of continuing membership.**

4. **DIRECT MARKETING.** We will NOT contact you by email, post or SMS with direct marketing messages.

## 5. **DISCLOSURE OF YOUR PERSONAL INFORMATION**

We share personal information with the following parties:

- **Any party approved by you.**
- **Federacion de Bolos Comunidad Valenciana (FBCV), Levante Lawn Bowls (LLB), Costa Blanca Umpires and Markers Association and other bowls clubs that are members of Levante Lawn Bowls:** to allow them to properly administer the sport on a local, regional and national level.
- **The Government or our regulators and their agents:** where we are required to do so by law or to assist with their investigations or initiatives.
- **Police, law enforcement and security services:** to comply with local laws, assist with the investigation and prevention of crime and the protection of national security.
- **The BBC Board and Committee Members:** Publishing information in the "club house", "bowls office" or "cabin", and communicating information to affiliated bowls clubs about fixtures.

## 6. **TRANSFERRING YOUR PERSONAL INFORMATION INTERNATIONALLY**

The personal information we collect is not transferred to or stored outside of the UK and EU, except for email contact information held by Google, who maintain servers around the world, and who regardless of where the information is processed, apply the same protections described in this policy.

## 7. **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 commercial practice and regulatory requirements. Generally, where there is no legal requirement we retain all physical and electronic records for a period of two years after your last contact with us or the end of your membership. Exceptions to this rule are:

- Details regarding unsuccessful membership applicants where we hold records for a period of not more than 12 months
- Details of Title Holders who have “Resigned”, “Lapsed” or “Deceased” where we hold records until after their title shares have been transferred.
- 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 long 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 us know if anything changes, for example if you change your phone number, email address, home address or emergency contact details. You can contact us by using the details set out in the "**Contacting Us**" section below.

## 8. 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 object to the processing of your personal information;
- the right to request that we transfer elements of your data either to you or another service provider;

You should note that some of these rights, for example the right to require us to transfer your data to another service provider or the right to object to processing of personal information 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 us.

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 your local data protection regulator. We encourage you to first contact us, to resolve your complaint.

## 9. CHANGES TO THIS NOTICE

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

## 10. CONTACTING US

In the event of any general query or complaint in connection with the information we hold about you, please contact our Secretary: [sec.bbc1@gmail.com](mailto:sec.bbc1@gmail.com)

For amendments to personal information contact our Membership Secretary: [memsec.bbc1@gmail.com](mailto:memsec.bbc1@gmail.com)

For information regarding website data, contact our Website Manager: [webman.bbc1@gmail.com](mailto:webman.bbc1@gmail.com)