

WINCHESTER EAGLES VOLLEYBALL CLUB
PRIVACY POLICY
AUGUST - 2025

This privacy policy outlines the types of personal data collected by the **WINCHESTER EAGLES VOLLEYBALL CLUB**, how that data is collected, and the ways in which it is processed and protected.

References to **we**, **our** or **us** in this privacy notice are to **Winchester Eagles Volleyball Club**

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 Chairman has overall responsibility for data protection compliance in our organisation.

1. Types of data collected

- **Personal details:** name, title, date of birth, gender.
- **Contact details:** email address, telephone number.
- **Membership details:** membership start and end date.
- **Interactions with us:** email and written correspondence.
- **Financial details:** records of transactions with us.
- **Media:** photographs, video, and voice recordings captured during activities and events.
- **Emergency contacts:** next of kin, family members, coaches.
- **Participation details:** competition results, events/games attended, team preferences (e.g., court position, shirt number).
- **Other relevant information:** disciplinary/grievance records, relevant qualifications.

We may collect **special category** health information about you. This can include details relevant to fitness and health checks, or information needed to ensure the safe running of training sessions.

2. How data is collected

- **Membership:** personal data is collected when individuals register for or renew their membership with the club.
- **Enquiries:** personal data is collected when individuals voluntarily contact us by sending an email to our official club address.
- **Media content:** photographic and video material is captured by club staff or authorised individuals during club activities and/or events.

3. Legal basis for processing

Legitimate Interest Assessments(s) (LIA) have been carried out using the ICO's framework to ensure we hold a valid basis for processing your personal data.

- **Membership:** We process personal data provided when you register for membership on the basis of *legitimate interest*.
- **Enquiries:** We process personal data received through email enquiries on the basis of *legitimate interest*.
- **Media Content (Photographic and Video):** As legitimate interest is not sufficient in this context, we rely on **explicit consent** for capturing and using photographic and video content. Consent is obtained clearly and specifically from individuals before any media is collected or used.
- **Health Information (Special Category Data):** We process health information only with your **explicit consent**, which is requested clearly at the point of collection (e.g. on membership forms or medical questionnaires). This information is used solely to ensure the safe running of training sessions and activities.

4. Purpose of processing the data

- **Membership:** Personal data from membership registrations is processed to administer and manage memberships, maintain accurate records, communicate with members, and deliver the services and activities of the club.
- **Enquiries:** Personal data from enquiries is processed solely for the purpose of responding to the individual's request or question.
- **Media Content:** Photographic and video content is processed to promote the club's activities, enhance its online presence, and support marketing efforts across platforms such as social media, the club website, and printed materials.

5. Data sharing and disclosure

We do not share or sell your personal data, except in the following cases:

- **Service providers:** when necessary, data may be shared with trusted third-party providers who support the club's operation (e.g., email services, website hosting). These providers are only given access to the data required to perform their services.
- **Governing bodies or regional sports bodies:** where required, we may share data to enable them to properly administer the sport on a local, regional, and national level.

- **Legal requirements:** we may disclose personal data if required by law or in response to a lawful request from public authorities, regulators, or law enforcement agencies, including to assist with investigations, prevent crime, or support national security.

We do not sell or trade personal data for financial gain under any circumstances.

6. Data retention

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.

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 6 years after your last contact with us or the end of your membership. Exceptions to this rule are:

- **Unsuccessful Membership Applicants:** Records of individuals who applied but were not accepted as members are retained for a maximum of **12 months**.
- **Potential Claims Information:** Information that could be relevant to **personal injury or discrimination claims** is kept until the applicable **limitation period expires**. For these types of claims, the limitation period may **begin long after the event**, meaning retention could be for an extended duration.

7. How data is protected

We take the security of your personal data seriously and implement multiple measures to protect it, including:

- Using **two-factor authentication** (2FA) on our official email accounts and data storage systems to prevent unauthorized access.
- Enforcing **strict access controls** based on the principle of least privilege, ensuring only authorized personnel who need access to the data are granted it.
- **Managing sessions** carefully by requiring manual logout after use, and refraining from storing passwords in plain text.

8. Children's Privacy

Personal data of children is treated with the same level of care and protection as all other personal data.

However, where processing requires consent, we obtain explicit consent from a parent or legal guardian before collecting or using a child's personal data.

9. User rights under UK GDPR

As a data subject you have the following rights regarding your personal data, under the UK GDPR:

- **Right to be Informed:** You have the right to know how your personal data is collected, used, and stored.
- **Right of Access:** You can request a copy of the personal data we hold about you.
- **Right to Rectification:** You can ask us to correct any inaccurate or incomplete personal data.
- **Right to Erasure (Right to be Forgotten):** You can request that we delete your personal data in certain circumstances, such as when it is no longer necessary for the purposes it was collected. We will make reasonable efforts to delete your data upon such a request, subject to any legal or regulatory obligations to retain it.
- **Right to Withdraw Consent:** Where processing is based on your consent, you have the right to withdraw that consent at any time. Withdrawal of consent will not affect the lawfulness of processing based on consent before its withdrawal.

10. Contact details for privacy queries

You can contact the club for any enquiries regarding the privacy policy and/or your rights at the **official email address:** winchestereaglessocial@gmail.com