



SECTION	HR
POLICY /PROCEDURE	Data Privacy Policy – GDPR
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The purpose and activities of Club Doncaster, as an organization, means that we will need to collect and use information about groups of people that may come into contact with the group. This may include, but not be limited to, customers, suppliers, workers, students, volunteers, and participants.

Club Doncaster organisations are defined as Doncaster Rovers Football Club, Doncaster Rugby League Club, Club Doncaster Foundation, Impact Doncaster, and Doncaster CIC.

The information that we collate, store, and destroy is governed under the General Data Protection Regulation (GDPR) guidelines 2016, which has replaced the Data Protection Act 1998. We take our duties seriously when respect the trust that is given to use to ensure that the information is used appropriately and responsibly to benefit all parties.

Club Doncaster abides to the principles of GDPR and support the responsible use of data and its storage. We will ensure we have a legal reasoning for this data to be stored, are clear on what we use it for, and promote your right to be forgotten within all of our systems.

All workers, staff and volunteers are responsible for the delivery of this policy and its implementation to protect the data they come into contact with on a daily basis.

We ensure that persons associated with Club Doncaster are aware of their responsibilities, through induction, we undertake both verbal orientation in respect of duties and responsibilities and introduction to the named data protection officer. Our principles are also written within the person’s handbook, and within all Service level agreements entered into with third parties.

When there are significant law changes and changes to the policy, face to face workshops will be undertaken to highlight policy changes and refresh good practice will be undertaken at the minimum frequency of once every 12 months. This is via team meetings, and mass briefings across Club Doncaster.

Club Doncaster defines personal data as both facts and opinions about an individual and where the information stored can identify an individual. For example it may include a person’s name, age, and address, date of birth, bank details, or transactions exchanged within Club Doncaster.

In line with the changes from the Data Protection Acts to European GDPR legislation, Club Doncaster will ensure its practice, this and other policies will follow the government’s seven golden rules for information sharing. This is also relevant and appropriate to other Club Doncaster’s policies such as safeguarding.

For the purposes of clarification the latest guidance can be accessed through the following link:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/721581/Information_sharing_advice_practitioners_safeguarding_services.pdf

Club Doncaster will reasonably comply with the principles detailed below:

To only use and store data when consent is explicitly given, and will not use assumed consent
Enable all persons to view and access the data we keep, and where it is processed and used.
To correct any identified errors as soon as this is practically possible.
To be clear about when and how data is processed and used.
To remove and "forget" data when requested.

For the purposes of data storage, we will store details of all persons that may come into contact with our services, primarily via written consent, but in some transactions, this may be formal verbal consent. We will ensure that we are able to evidence we have taken appropriate steps to ensure that a person under the age of 18 has the permission of their parent / legal guardian to enter into information sharing, and deem it best practice and preference to communicate with parents directly and not minors.

When requiring information as a part of our service to you. Club Doncaster will ask your permission to share information internally within specific departments for the purposes of marketing emails. Should the product or information require us to liaise with external agencies, we will name this person as a party to the data and seek your permission to do this. We understand that this is your choice as to how we share your information, and you may contact us at any time to withdraw your consent. We may require to pass on your personal data to third partners, who provide a service on our behalf, this is for the sole purpose of completing tasks and providing a service to you, and this is made clear in all service level agreements that we have with companies.

When Club Doncaster receives or transmits payments via electronic means, (i.e.) Card or bank transactions, these will be submitted via our online banking system and payments systems.

Should your data be at risk from the loss or external security threat we will notify you in any situation that may be expose you to serious risk. In order to minimize this risk we will take appropriate security measures against the information we have stored. This includes cloud based password systems, and shared networks not personal computer spaces, and ensuring that data will only be accessed to appropriately authorized persons via passwords and role examinations.

We will hold you data on our systems for as long as we have a customer / supplier agreement in place with you and the communication / transaction remains live. Following the end of any transaction / communication, we will continue to hold any information for a maximum of three years before securely deleting / destroying the information we hold on you.

We will review our policy and the reasoning for keeping your personal data annually and establish whether we are still entitled to process it. If we decide that we are not entitled to do so we will archive your data securely and destroy after three years, or the relationship is reintroduced.

If the information we hold is in relation to a legal or safeguarding matter we will hold this information as long as is necessary to comply with our legal obligations.

In relation to staff files, we will hold information for as long afterwards as it is within Club Doncaster's legitimate reasons to do so.

All persons have the right to access their information held by Club Doncaster. Any data held on them can be requested in writing to the Data Controller who will respond within 28 days upon receipt of any request. Please note that certain data is exempted from any release, which may hinder any past, present or future, criminal, statutory or legal investigation.

All persons have the right to correct any information, which they believe to be inaccurate. Data subjects must notify the Data Controller of any changes or additional notes they wish to add to their data, which will ensure this is added to any records that are still live within 28 days.

All persons have the right to be forgotten and have their data removed from Club Doncaster systems. All data can be requested to be "forgotten" in writing to the data controller who will ensure that data is removed from all appropriate systems. Please note that certain data is exempted from any release, which may hinder any past, present or future, criminal, statutory or legal investigation.

In the majority of cases, where information is not stored for the purposes of Safeguarding or legal reasons, we will actively seek consent to store and keep information (detailed in appendix A).

Further information in relation to GDPR can be found at the website for the Information Commissioner www.ico.gov.uk.

The information commissioner can also be contacted:

Information Commissioners Office

Wycliffe House

Water Lane

Wilmslow

Cheshire

SK9 5AF

Our named Data Protection Controller is Richard Poole, Finance Director he can be contacted at

Richard.poole@clubdoncaster.co.uk .

Eco - Power Stadium

Stadium Way

Doncaster

DN4 5JW

The Data Protection Controller will endeavor to ensure that personal data stored within Club Doncaster activity is processed in compliance with this policy. Any questions about the operation of this policy and concerns that the policy is not been followed should be referred in the first instance to the Data Protection Controller or reported in line with Club Doncaster's grievance and whistleblowing policies.

We have implemented via Lakeside IT Services acceptable security settings to protect the loss, misuse and destruction of your data from electronic storage. We do not however accept liability when the data transferred over to us within the internet is 100% secure.

Appendix A

Type Of Information	Purpose	Legal Basis of Processing
Customers Name, Address, telephone number, email address, date of birth	To purchase match & season tickets Initial comments / complaints / customer queries.	Performing Club Doncaster's contract with the member, and legitimate interests in operating Club Doncaster.
Business to Business, contact name, telephone number, address, email address	To purchase pre agreed corporate packages and sponsorship opportunities.	Performing Club Doncaster's contract with the member, and legitimate interests in operating Club Doncaster.
Parental Consent for customers under the age of 18, Children's name, address, telephone number, email address, date of birth	To purchase match & season tickets. To join Junior Rovers / Red Squad activities.	Performing Club Doncaster's contract with the parent / carer on behalf

	<p>To participate in Match Day Experiences.</p> <p>To become a mascot during match day.</p> <p>To register as a Player associated with Doncaster Rovers.</p> <p>To register as a Player with Doncaster Rugby League Club.</p> <p>To participate in Club Doncaster Foundation, Impact Doncaster, and Doncaster CIC activities.</p>	
Emergency Contact Details	Contacting next of kin in an emergency	Protecting vital interests in respect of the person.
Staff / Volunteers Name, Address, telephone number, email address, date of birth	To manage the staff work force, and ensure that two way communication can be delivered.	Performing Club Doncaster's contract with the member, and legitimate interests in operating Club Doncaster.
Photos and videos of customers at Club Doncaster Activity	Putting on the Club Doncaster website, used for marketing purposes,	For specific project and pictures of minors we will seek consent via an appropriate activity based consent form.
Photos and Videos of workers/ volunteers on Club Doncaster activity	ID card purposes, identification purposes, marketing purposes	Consent will be sought within all working agreements between parties.
Customer Bank Account / Payment Details	Managing the member's payment for services rendered.	Performing Club Doncaster contract.
Staff Bank Account / Payment Details	Managing the payment of contracts via PAYE	Performing Club Doncaster contract.
Supplier Bank Account / Payment Details	Managing the payment of services as per Service Level Agreements.	Performing Club Doncaster contract.
CCTV moving and still imaging	Managing the security of the building and any person connected with Club Doncaster.	The safety of the building & legal obligations when required.