

Barnes RFC – Draft Privacy Notice

Last updated: September 2025

1. About this Notice

This notice explains how Barnes Rugby Football Club and our subsidiary Barnow Trading Limited (“the Club”, “we”, “us”) collect, use, and protect your personal information. It also explains how the Rugby Football Union (“RFU”) uses information through its Game Management System (GMS).

2. What information we collect

We collect personal data when you join the Club, renew membership, or take part in matches, events, or club activities. This may include:

- **Identity details:** name, gender, date of birth, membership ID / RFU ID.
- **Contact details:** address, email, phone number.
- **Role details:** type of membership, team involvement, or club role (e.g. Chair, Safeguarding Lead).
- **Payment details:** bank or card details where you pay for membership, kit, or other purchases.
- **Medical details:** information you (or your parent/guardian) provide so we can support you safely.
- **Eligibility details:** passport or National Insurance information where legally required (e.g. right-to-work checks).
- **Participation records:** match reports, team sheets, results, disciplinary matters.
- **Safeguarding checks:** Disclosure & Barring Service (DBS) results for certain roles.
- **Preferences:** your marketing choices and consents.

Some information may also come from others, e.g. parents providing details about their children, or the RFU providing registration or disciplinary history.

3. How we use your information and the legal basis

We use your data for the following purposes:

- To perform and fulfil a contract (UK GDPR Art. 6(1)(b)) in order to
 - Process membership applications and payments.
 - Communicate with you about fixtures, events, or purchases.
 - Deliver products, prizes, or services.
- As required by the Club to conduct our business for our legitimate interests (UK GDPR Art. 6(1)(f)) to:
 - Administer memberships and teams.
 - Maintain club history (e.g. match reports, team sheets).
 - Use CCTV to keep our premises safe.

- Send you offers or promotions for club-related services, unless you object.
- Invite you to take part in surveys or feedback.
- With your consent (UK GDPR Art. 6(1)(a)) in order to:
 - Send direct marketing by email.
 - Record and use medical/disability information to support you.
 - Use photos or videos for publicity, if consent is given.
- To meet legal obligations (UK GDPR Art. 6(1)(c)) for the following reasons:
 - To maintain our health & safety and accounting records.
 - To carry out DBS checks for safeguarding.
 - To confirm the right to work for certain roles.
 - To respond to lawful requests from certain government or law enforcement public authorities.

4. How the RFU uses your data

The RFU operates the Game Management System (GMS) and uses your data to:

- Register players, officials, and club roles.
- Check eligibility, including safeguarding and anti-doping measures.
- Maintain official records of the game, including discipline and misconduct.
- Communicate about rugby participation and initiatives.
- Analyse statistics and participation trends.
- Comply with RFU Rules and Regulations.

The RFU has its own privacy notice which can be found at <https://www.englandrugby.com/the-rfu/policies/privacy-notice>

5. Children's Data

Many of our members are under 18. We take extra care when handling children's information. The care we take includes the following:

- We always seek prior consent from parents/guardians, where required.
- We only use children's data for participation, safeguarding, and club administration.
- We do not use children's data for marketing without explicit parental consent.
- We ensure that the following principle is strictly understood and maintained: Children and parents have the same rights under data protection law.

6. Sharing your information

We may share some of your information with:

- The RFU and other rugby bodies (clubs, leagues, referees, Constituent Bodies) in order to maintain appropriate records and assist us in organising matches and administering the game.

- Service providers who support our IT, websites, payments, and communications, as well as the RFU as the provider of GMS.
- Insurers and professional advisers.
- Police, regulators, or public authorities, if legally required.

International transfers:

Some providers process data outside the UK. Where this happens, we ensure your data is protected using UK-approved safeguards (e.g. International Data Transfer Agreement (IDTA), UK Addendum to the EU Standard Contract Clauses).

7. How long we keep your information

- Membership data: for as long as you are an active member, and up to 3 years afterwards.
- Contracts/financial data: 6 years after last interaction (to meet legal requirements).
- Marketing data: until you withdraw consent or opt out. We also keep a record of the fact that you have asked us not to send you direct marketing or to process your data indefinitely so that we can respect your request in future.
- CCTV: normally kept for 30 days, unless needed for an investigation.
- Historic records: match reports, results, team sheets may be kept indefinitely as part of the club's sporting history.

The RFU will maintain records of individuals who have registered on GMS, records of DBS check and the resulting outcomes and other disciplinary matters for such period as is set out in the RFU's privacy notice.

8. Your rights

You have the right to:

- Access your personal data.
- Ask us to correct or delete your data in some cases.
- Restrict (i.e. stop any active processing) or object to certain processing (e.g. where we don't have to process the data to meet a contractual or other legal requirement).
- Receive your data in a portable format where you provided it with consent or a contract.
- Withdraw consent at any time (e.g. for marketing or medical data).
- Complain to the Information Commissioner's Office (ICO) if you are unhappy with how we use your data.

Some rights may be limited if fulfilling them would impact others' rights or if we must keep certain data for legal reasons.

You have the same rights for held by the RFU for its own purposes on GMS.

To exercise any of these rights, you can get in touch with us or, as appropriate, with the RFU using the details in Section 10 below.

If you have any unresolved concerns, you have the right to complain to the Information Commissioner's Office.

9. Contact us

If you have questions or concerns about how we use your data, contact:

Email: data.privacy@barnesrugby.club

Post: Data Privacy, Barnes RFC, Queen Elizabeth Walk, London, SW13 9SA

For RFU-related matters, contact:

Email: legal@rfu.com

Post: Data Protection Officer, Rugby Football Union, Twickenham Stadium, 200 Whitton Road, Twickenham TW2 7BA

10. Updates to this notice

We review this notice on a regular basis and at least annually. The latest version will always be published on our website. This Privacy Notice was last updated and approved by the Club Committee in **[insert date]**.