



**Blisworth Football Club Trading Limited**

(Registered Charity No. 1198290)

Courteenhall Road, Blisworth. NN7 3DD

## **Data Protection and Privacy Policy**

Following the General Election results from 4<sup>th</sup> July 2024, at the time of adopting this policy, there have been no new legislations passed. During the course of the year in which this policy falls, any new legislations will be reflected in this policy and adopted at a further meeting during the year. The following is deemed to be true as of May 2025.

We at Blisworth Football Club Trading Limited take your privacy seriously and are committed to a policy of protecting the rights and privacy of individuals. Blisworth Football Club Trading Limited will collect and use certain types of Personal Data (PD) in order to carry out our work. This personal information must be collected and handled securely.

The Data Protection Act 1998 (DPA) and General Data Protection Regulations (GDPR) govern the use of information about people (personal data). Personal data can be held on computers, laptops and mobile devices, or in a manual file, and includes email, minutes of meetings, and photographs.

The charity/club will remain the data controller for the information held. The trustees and volunteers are personally responsible for processing and using personal information in accordance with the Data Protection Act and GDPR. Trustees and volunteers who have access to personal information will therefore be expected to read and comply with this policy.

The purpose of this policy is to set out the Blisworth Football Club Trading Limited commitment and procedures for protecting personal data. Trustees regard the lawful and correct treatment of personal information as very important to successful working, and to maintaining the confidence of those with whom we deal. We recognise the risks to individuals of identity theft and financial loss if personal data is lost or stolen.

The following are definitions of the terms used:

**Data Controller** - the trustees who collectively decide what personal information Blisworth Football Club Trading Limited will hold and how it will be held or used.

**Act** means the Data Protection Act 1998 and General Data Protection Regulations - the legislation that requires responsible behaviour by those using personal information.

**Data Subject** – the individual whose personal information is being held or processed by Blisworth Football Club Limited for example a donor or hirer.

**Information Commissioner's Office (ICO)** - the ICO is responsible for implementing and overseeing the Data Protection Act 1998.

**Processing** – means collecting, amending, handling, storing or disclosing personal information.

**Personal Information** – information about living individuals that enables them to be identified – e.g. names, addresses, telephone numbers and email addresses. It does not apply to information about organisations, companies and agencies but applies to named persons, such as individual volunteers.

## **The Data Protection Act**

This contains 8 principles for processing personal data with which we must comply.

### **1. Personal data**

1. Shall be processed fairly and lawfully and, in particular, shall not be processed unless specific conditions are met.
2. Shall be obtained only for one or more of the purposes specified in the Act and shall not be processed in any manner incompatible with that purpose or those purposes.
3. Shall be adequate, relevant and not excessive in relation to those purpose(s).
4. Shall be accurate and, where necessary, kept up to date.
5. Shall not be kept for longer than is necessary.
6. Shall be processed in accordance with the rights of data subjects under the Act.
7. Shall be kept secure by the Data Controller who takes appropriate technical and other measures to prevent unauthorised or unlawful processing or accidental loss or destruction of, or damage to, personal information.
8. Shall not be transferred to a country or territory outside the European Economic Area unless that country or territory ensures an adequate level of protection for the rights and freedoms of data subjects in relation to the processing of personal information.

### **2. Applying the Data Protection Act within the charity**

We will let people know why we are collecting their data, which is for the lawful purpose of managing Blisworth Football Club Trading Limited, its hiring, marketing, publicity for events, fundraising and finances. It is our responsibility to ensure PD is only used for this purpose unless specific consent is given or the PD is already in the public domain. Access to personal information will be limited to trustees and volunteers.

### **3. Correcting data**

Individuals have a right to make a Subject Access Request (SAR) to find out whether the charity holds their personal data, where, what it is used for and to have data corrected if it is wrong, to prevent use which is causing them damage or distress, or to stop marketing information being sent to them. Any SAR must be dealt with within 30 days. Steps must first be taken to confirm the identity of the individual before providing information, requiring both photo identification e.g. passport and confirmation of address e.g. recent utility bill,

bank or credit card statement. Any concerns about complying with a SAR need to be discussed promptly with the club's named DP contact or with the ICO.

#### **4. Responsibilities**

Blisworth Football Club Trading Limited is the Data Controller under the Act, and is legally responsible for complying with the Act, which means that it determines what purposes personal information held will be used for.

The management committee will take into account legal requirements, ensuring that it is properly implemented, and will through appropriate management and strict application of criteria and controls:

- a) Collect and use information fairly.
- b) Specify the purposes for which information is used.
- c) Collect and process appropriate information, and only to the extent that it is needed to fulfil its operational needs or to comply with any legal requirements.
- d) Ensure the quality of information used.
- e) Ensure the rights of people about whom information is held, can be exercised under the Act. **These include:**

- The right to be informed that processing is undertaken;
- The right of access to one's personal information;
- The right to prevent processing in certain circumstances, and the right to correct, rectify, block or erase information which is regarded as wrong information;
- Take appropriate technical and organisational security measures to safeguard personal information;
- Ensuring that personal information is not transferred abroad without suitable safeguards;
- Treating people justly and fairly whatever their age, religion, disability, gender, sexual orientation or ethnicity when dealing with requests for information;
- Setting out clear procedures for responding to requests for information.

#### **5. Procedures for Handling Data & Data Security**

Blisworth Football Club Trading Limited has a duty to ensure that appropriate technical and organisational measures are taken to prevent:

- Unauthorised or unlawful processing of personal data;
- Unauthorised disclosure of personal data;
- Accidental loss of personal data.

All trustees and volunteers must therefore ensure that personal data is dealt with properly no matter how it is collected, recorded or used. This applies whether or not the information is held on paper, in a computer or recorded by some other means e.g. tablet or mobile phone. Personal data relates to data of living individuals who can be identified from that data and use of that data could cause an individual damage or distress. This does not mean

that mentioning someone's name in a document comprises personal data; however, combining various data elements such as a person's name and salary or religious beliefs etc. would be classed as personal data, and falls within the scope of the DPA. It is therefore important that all members consider any information (which is not otherwise in the public domain) that can be used to identify an individual as personal data and observe the guidance given below.

## 6. Privacy Notice

The privacy notice is as follows:

Blisworth Football Club Trading Limited uses personal data for the purposes of managing the Clubhouse, its bookings and finances, marketing and running events. Data may be retained for up to 7 years for accounts purposes and for longer where required e.g. by the Clubhouse's insurers. If you would like to find out more on how we use your personal data or want to see a copy of information about you that we hold, please contact **a member of the Bookings Team** at [bookings@blisworthfc.co.uk](mailto:bookings@blisworthfc.co.uk)

## 7. Operational Guidance

### Email:

- All trustees and volunteers should consider whether an email (both incoming and outgoing) will need to be kept as an official record. If the email needs to be retained it should be saved into the appropriate folder or printed and stored securely;
- Emails that contain PD personal information no longer required for operational use, should be deleted from the personal mailbox and any "deleted items" box.
- Where someone (not a trustee or contractor) needs to be copied into an email e.g. a wider circulation list for an upcoming event, we encourage use of bcc instead of cc;
- All Blisworth Football Club Trading Limited correspondence by the Bookings Team in relation to bookings and upkeep of the website etc will be through the use of a separate account.

### Phone Calls:

Phone calls can lead to unauthorised use or disclosure of personal information and the following precautions should be taken:

- Personal information should not be given out over the telephone unless you have no doubts as to the caller's identity and the information requested is innocuous;
- If you have any doubts, ask the caller to put their enquiry in writing;
- If you receive a phone call asking for personal information to be checked or confirmed, be aware that the call may come from someone impersonating someone with a right of access.

## **Laptops and Portable Devices:**

- All laptops and portable devices that hold data containing personal information must be protected with a suitable password which is changed regularly. Where sensitive data or financial information is held, an encryption program should be used;
- Ensure your laptop is locked (password protected) when left unattended, even for short periods of time;
- When travelling in a car, make sure the laptop is out of sight, preferably in the boot;
- If you have to leave your laptop in an unattended vehicle at any time, put it in the boot and ensure all doors are locked and any alarm set;
- Never leave laptops or portable devices in your vehicle overnight;
- Do not leave laptops or portable devices unattended in restaurants or bars, or any other venue;
- When travelling on public transport, keep it with you at all times, do not leave it in luggage racks or even on the floor alongside you.

## **Data Security and Storage:**

Store as little PD as possible relating to Blisworth Football Club Trading Limited on your computer or laptop; only keep those files that are essential. Personal data received on disk or memory stick should be saved to the relevant file on the computer or laptop. The disk or memory stick should then be securely returned (if applicable), safely stored or wiped and securely disposed of.

## **Passwords:**

- Do not use passwords that are easy to guess. Passwords should contain both upper and lower-case letters and preferably contain some numbers and special characters. Ideally passwords should be 8 characters or more in length.
- Protect Your Password; common sense rules are:
  - Do not give out your password;
  - Do not write your password somewhere on your laptop;
  - Do not keep it written on something stored in the laptop case.

## **Data Storage:**

Personal data will be stored securely and will only be accessible to authorised committee members. Information will be stored for only as long as it is needed or required by statute and will be disposed of appropriately. For financial records this will be up to 7 years. Archival material such as minutes and legal documents will be stored indefinitely. Other correspondence and emails will be disposed of when no longer required. All personal data held for the organisation must be non-recoverable from any computer which has been passed on/sold to a third party.

## **Accident Book:**

This will be checked regularly. Any page which has been completed will be removed, appropriate action taken, and the page filed securely.

## **Photographs:**

Blisworth Football Club Trading Limited may use general photographs of events with groups of adults at the Clubhouse for publicity purposes in accordance with its lawful basis for using PD. Photos of children must not be used without the written consent of the parent or guardian. However, Blisworth Football Club Trading Limited is aware that for some individuals publicising their location could place them or their families at risk.

Consequently, at large events at which publicity photos may be taken, a notice should be posted at the entrance, or an announcement made, providing opportunity for people to refuse taking part in publicity photographs. At small events the consent of individuals (verbal) should be obtained if their image will be clearly identifiable. Hirers are encouraged to comply with this policy.

## **Data Subject Access Requests:**

We may occasionally need to share data with other agencies such as the local authority, funding bodies and other voluntary agencies in circumstances which are not in furtherance of the management of the charity. The circumstances where the law allows the charity to disclose data (including sensitive data) without the data subject's consent are:

- a) Carrying out a legal duty or as authorised by the Secretary of State Protecting vital interests of a Data Subject or other person e.g. child protection;
- b) The Data Subject has already made the information public;
- c) Conducting any legal proceedings, obtaining legal advice or defending any legal rights;
- d) Monitoring for equal opportunities purposes – i.e. race, disability or religion.

We regard the lawful and correct treatment of personal information as very important to successful working, and to maintaining the confidence of those with whom we deal. If an agency asks for PD not in compliance with one of the above e.g. to obtain information about improving a service, a consent form will need to be issued to the data subjects asking for their consent to pass their PD on.

We intend to ensure that personal information is treated lawfully and correctly.

## **8. Risk Management:**

The consequences of breaching Data Protection can cause harm or distress to service users if their information is released to inappropriate people, or they could be denied a service to which they are entitled. Trustees and volunteers should be aware that they can be personally liable if they use customers' personal data inappropriately. This policy is designed to minimise the risks and to ensure that the reputation of the charity is not damaged through inappropriate or unauthorised access and sharing.

### **Information we collect**

Blisworth Football Club Trading Limited will always make it clear when personal information is collected and explain what we intend to do with it. Your consent will be gained for us to communicate with you about Clubhouse bookings, events and functions. We do not share your personal information with third parties unless we have your consent, or we are to comply with legal obligations. When you contact Blisworth Football Club Trading Limited, we will obtain information from you to enable us to contact you with regards to the booking of the Clubhouse. Using the online booking system, Hallmaster, we will collect details including your name, email address, home address and contact telephone number. This will be provided by you and therefore has been provided with your consent.

For Trustees, information will be collected to ensure suitability to be a Trustee in line with the Charities Commission Guidelines. Your consent will be gained to hold information and share this with the Charities Commission through completion of the Trustee Agreement Form.

### **Use of your information**

Blisworth Football Club Trading Limited may hold and process personal data that you provide to us in accordance with the GDPR. The information that we collect and store relating to you is primarily used to enable us to provide our services to you, and to meet our contractual commitments to you.

Blisworth Football Club Trading Limited will not hold personal data longer than necessary. There are certain legal requirements or recommendations which mean that we will keep documents for a minimum period of time:

- Receipts and invoices are kept for six years from the end of the current financial year;
- Booking/hirer information are kept for three years from the end of the current financial year;
- Financial donor records are kept for six years from the end of the current financial year;

- Management Committee and AGM minutes are stored electronically for an indefinite period, for reference purposes;
- Trustee information is to be retained for the duration of service plus three years and may be kept by the Charity Commission in line with their retention periods.

Blisworth Football Club Trading Limited will periodically review these retention periods to ensure that they remain within the law and recommended practice. Following the retention period or where a request to destroy data has been agreed, the data will be confidentially destroyed.

## **Security**

All physical data will be held securely in a non-public location, accessible only by the 4 Trustees (Matt Goude, Sam King, Mark Smith and Yvonne Barker) of Blisworth Football Club Trading Limited.

The transmission of information via the Internet or email is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of data while you are transmitting it to our site; any such transmission is at your own risk. Once we have received your personal data, we will use strict procedures and security features to try to prevent unauthorised access.

## **Your rights**

The GDPR gives you the right to access information held about you by us. Please contact us by email at [bookings@blisworthfc.co.uk](mailto:bookings@blisworthfc.co.uk) if you wish to request confirmation of what personal information we hold relating to you. There is no charge for requesting this and we will provide the information to you within 30 days of your requesting the data.

You also have the right to change the permissions that you have given us in relation to how we may use your data, as well as requesting we cease using your data or that we delete all personal data records that we hold relating to you.

**Date of policy: May 2025**

**Date of review: May 2026**