

# RFA Members Privacy Policy

May 2018

## Introduction

The Rugby Fives Association (RFA) is committed to protecting our members' privacy and takes its responsibility regarding the security of member information very seriously. We will be clear and transparent about the information we are collecting and what we will do with that information.

This Policy sets out the following:

What personal data we collect and process about you in connection with your relationship with us as a member:

- Where we obtain the data from
- What we do with that data
- How we store the data
- Who we transfer/disclose that data to
- How we deal with your data protection rights
- And how we comply with the data protection rules

All personal data is collected and processed in accordance with UK and EU data protection laws.

## Data Controller

The RFA is the "data controller" of all personal information that is collected and used about RFA members for the purposes of the General Data Protection Regulation (GDPR).

## What Personal Data we collect

Personal data means any information relating to you which allows us to identify you, such as your name, contact details and bank details.

Specifically, we may collect the following categories of information:

- a. Name, home address, e-mail address, telephone number, date of birth, school/university details, bank details and gift aid details.
- b. The communications you exchange with us or direct to us via letters, emails, chat service and calls.

Personal details about your physical or mental health are considered “sensitive” personal data under applicable data protection laws. We will process any such data only if you have given your explicit consent or you have deliberately made it public.

## What we use your personal data for, why and for how long

Your data may be used for the following purposes:

- a. Providing member services to you such as making you aware of upcoming tournaments or events and sending out newsletters. Your contact details are also shared with other members in the form a “Pocket Book”.
- b. Taking payment for membership: we will use your bank details to take your membership subscription. This information may be passed to a third party.
- c. Security, health, administrative, crime prevention/detection: we may pass your information to government authorities or enforcement bodies for compliance with legal requirements
- d. Administrative or legal purposes: We are required to maintain records of members and financial information. These records need to be stored, processed and updated time to time in requirement with the law.

We will only process your personal data where we have a legal basis to do so. The legal basis will depend on the reasons we have collected and need to use your personal data for.

In most cases we will need to process your personal data so we can enter into our contract of employment with you.

We may also process your personal data for one or more of the following:

- To comply with a legal obligation (e.g. Charities Act)
- You have consented to us using your personal data (e.g. for marketing related uses);

- To protect your vital interests or those of another person (e.g. in case of a medical emergency)
- It is in our legitimate interests in operating as a member organisation (e.g. for administrative purposes).

We will not retain your data for longer than is necessary to fulfil the purpose it is being processed for. To determine the appropriate retention period, we consider the amount, nature and sensitivity of the personal data, the purposes for which we process it and whether we can achieve those purposes through other means.

We must also consider periods for which we might need to retain personal data in order to meet our legal obligations.

When we no longer need your personal data, we will securely delete or destroy it. We will also consider if and how we can minimise over time the personal data that we use, and if we can anonymise your personal data so that it can no longer be associated with you or identify you, in which case we may use that information without further notice to you.

## Security of your personal data

We follow strict security procedures in the storage and disclosure of your personal data, and to protect it against accidental loss, destruction or damage. The data you provide to us is protected using SSL (Secure Socket Layer) technology. SSL is the industry standard method of encrypting personal information so that they can be securely transferred over the Internet.

We may disclose your information to trusted third parties for the purposes set out in this Privacy Policy. We require all third parties to have appropriate technical and operational security measures in place to protect your personal data, in line with UK and EU law on data protection rules.

## International Data Transfer

The RFA uses service providers who operate in multiple jurisdictions, some of which are not located in the European Economic Area (EEA), such as the USA. While countries outside the EEA do not always have strong data protection laws, we require all service providers to process your information in a secure manner and in accordance with UK and EU law on data protection. The RFA will avoid where possible transferring your data outside the EEA. We utilise standard means under EU law to legitimise data transfers outside the EEA.

## Sharing your personal data

We may also share your personal data with the following third parties for the purpose described in this Privacy Policy:

- a. Government authorities, law enforcement bodies and regulators for compliance with legal requirements
- b. Trusted service providers we are using to run our organisation such as bookkeeping agents, cloud service and email service providers which provide our computing infrastructure and email marketing service providers which help with member surveys.

## Data Protection Officer

We have appointed a Data Protection Officer ("DPO") to oversee compliance with this policy. You have the right to make a complaint at any time to a supervisory authority. The Information Commissioner's Office is the lead data protection supervisory authority for the RFA as a UK data controller.

## Your data protection rights

Under certain circumstances, by law you have the right to:

- Request information about whether we hold personal information about you, and, if so, what that information is and why we are holding/using it.
- Request access to your personal information (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- Request correction of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- Request erasure of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).
- Object to processing of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You

also have the right to object where we are processing your personal information for direct marketing purposes.

- Object to automated decision-making including profiling, that is not to be subject of any automated decision-making by us using your personal information or profiling of you.
- Request the restriction of processing of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- Request transfer of your personal information in an electronic and structured form to you or to another party (commonly known as a right to “data portability”). This enables you to take your data from us in an electronically useable format and to be able to transfer your data to another party in an electronically useable format.
- Withdraw consent. In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

If you want to exercise any of these rights, then please contact the RFA general secretary: [email@philip-atkinson.co.uk](mailto:email@philip-atkinson.co.uk)

You will not have to pay a fee to access your personal information (or to exercise any of the other rights).

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

## Changes to Privacy Policy

Our Privacy Policy may change from time to time and any changes to the statement will be communicated to you by way of an email.