

GENERAL DATA PROTECTION REGULATIONS (GDPR) STATEMENT OF OPERATION (SoO)

The GDPR legislation comes into force on 25th May 2018 and unlike the current Data Protection Act, GDPR encompasses all companies, organisations, clubs, associations and societies and the data (both electronic and paper) held about a living person and from that data a person can be uniquely identified. It also places upon the organisation (generic term for all entities effected) a requirement that whoever the organisation shares that data with are also compliant.

Conformance to the principles and requirements of GDPR is legal obligation placed upon all organisations, therefore as the first step towards us becoming compliant I have detailed below (to the best of my knowledge) the scope of information we as a club hold, how it is held, the purpose for data held, maintaining data integrity, who we exchange data with.

Scope of Data/Information Held.

- First & Last Name,
- Date of Birth.
- Home Address,
- Personal and/or business email address,
- Home and/or business and/or mobile telephone numbers,
- Gender.

Where Data is Held/Medium

Format	Location	Security	Owner
MS-outlook	Treasurers Internal Computer	Application password protection	Treasurer
	network.	Network external access controlled	
		by firewall and password logon.	
MS-Excel Workbook	Treasurers Internal Computer	Password protected to allow	Treasurer
	network.	opening.	
(Memberslist.xls)	Club website as	Password updated annually.	Membership
	downloadable file		Secretary
OfficeTalk	Treasurers Computer	Application protected by secure	Treasurer
	network.	login password.	
		No external access to application.	
1&1 email system.	Cloud based,	Password protection at cloud level	
Generic email accounts:	 passes data through to 	for both	Treasurer
	MS-Outlook (treasurer		
treasurer@	account)		
secretary@	 remains in cloud for 		Secretary
	secretary		
Club website	Internet based	Access to web site not password	Web Master
www.harpendenbadmintonclub.com		protected.	
Accounts System (Name	Treasurers Computer	Application protected by secure	Treasurer
only)	network.	login password.	
		No external access to application.	
WhatsApp Group	Personal phones	Dependant on individual phone	Treasurer
		setup.	Chair

Personal data (Name & mobile phone numbers) is held on individuals own mobile phone books. This is by definition outside of the remit of GDPR.

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Purpose Of Data Held

To enable the running of the club:

- · contact being made by team captains (or others) to establish teams for club matches
- keep members informed of social & club events, club news, AGM notification, usually via email
- ensure that current members are covered by insurance
- · registration requirements of Badminton England and local leagues.

Data Retention

Information is held on electronic membership list updated at least annually. The paper membership form is retained for up to 6 years.

Details of guests are held in paper form and retained for a limited period, usually 1 year after attendance.

Data Integrity

All membership lists are updated at both the seasons end (end of May & September) plus whenever of new person joins or leaves. Correctness/currency of all data held is for the individual to inform the data owner(s) of any change.

Data Privacy

Members details are retained in numerous places, primarily in soft form (computer files) but also in paper form (visitor & new members documents). It is expected and deemed necessary that all data forms held by club officers and members are protected and held securely as reasonably practical.

Information Exchange with external Organisations

Information is passed to Badminton England for registration purposes. This is a requirement of Herts county and SWHerts leagues that only registered persons play in matches under their control.

Personal data (name address, contact details) of match secretary, club secretary is provided to Herts County league and SWHerts County league administrators.

Information of the Treasurer/Person responsible for hall hire bookings is passed to SLM (Everyone Active) for invoicing purposes.

Information of the Treasurer & one other (nominally the chairman) is passed to Barclays Bank for bank account management purposes.

Data Protection Officer

As a Not for Profit organisation registration with the Information Commissioners Office is not a requirement of the legislation, thus the appointment of a Data Protection Officer is also not required. However, the club officers have a collective responsibility to ensure that the Club adheres to all of the GDPR principles.

Statement of Operation Review

A review of data storage, use, distribution and policy should be conducted annually.

Document History

Date & Version	Headline	Detail
May 2018 – v1	Initial publication	
October 2021 – v2	Minor updates	Inclusion of Membership Secretary. Change of BE Club number

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