

Winchester & District Athletics Club

WADAC

Data Protection Policy

1. Introduction

Winchester & District Athletics Club (known as “WADAC”) is committed to meeting its data protection legal obligations as set out in the UK General Data Protection Regulation (“UK GDPR”) and the Data Protection Act 2018 (“DPA18”). We will comply with the letter of the law and the spirit of the law.

This policy is a statement of intent from our Committee Members and sets out our obligations regarding data protection and the rights of individuals whose personal data we collect and process. It is supported by our Data Protection Code of Conduct, which sets out the standards of conduct expected from its committee members, coaches, and volunteers with access to personal data held by WADAC.

All committee members, coaches, and other volunteers with access to personal data held by WADAC must adhere to this Data Protection Policy and with our Data Protection Code of Conduct at all times.

2. Definitions

We use the following terms in this policy, which have the following meanings:

- “data subject” is an identified or identifiable living person.
- “personal data” means any information from which a data subject can be identified, whether on its own or when put together with other information. It includes (without limitation) information such as a name, an identification number, location data, online identifiers and factors specific to a data subject such as their physical, physiological, genetic, mental, economic, cultural and social identity.
- “processing” means anything we do with personal data, whether using electronic or manual methods. It includes (without limitation) collecting, recording, storing, organising, adapting, altering, using, disclosing and erasing personal data.

Responsibilities

The following parties are responsible for data protection at WADAC:

- The WADAC Committee is responsible for implementing and enforcing this policy and for our ongoing compliance activities.
- All **committee members, coaches** and **volunteers** working with personal data are responsible for ensuring it is kept securely, is accessible only to those who need to use it and is not disclosed to any third party without authorisation.
- All **committee members, coaches** and **volunteers** are responsible for adhering to this policy and our Data Protection Code of Conduct.

Questions about this policy or about data protection can be sent to secretary@wadac.org.uk.

Data Protection Principles

The following data protection principles shall govern the processing of personal data by WADAC:

Principle 1 - Fair, Lawful & Transparent

- *Personal data must be processed lawfully, fairly, and in a transparent manner in relation to the data subject.*

This means we must only collect and process personal data where it is lawful for us to do. We must provide data subjects with privacy information (a “privacy notice”) notifying them of the purposes for which we process their personal data at the time of collection, where it is collected directly from them, or as soon as possible (not more than one calendar month) after collection where it is obtained from a third party. The privacy notice must explain what processing will occur and must also include the information required by law.

Our privacy notice is available at this address <https://www.wadac.org.uk/policy-form-documents>

Principle 2 - Purpose Limitation

- *Personal data must only be collected and processed for specified, explicit and legitimate purposes, and not further processed in a manner that is incompatible with those purposes.*

This means the way we use personal data must match the description given in the privacy notice and be limited to what is necessary for those specific purposes.

Principle 3 - Data Minimisation

- *Personal data must be adequate, relevant and limited to what is necessary in relation to the purposes for which it is processed.*

This means we must collect and process only as much personal data as we need for the purposes of the processing (as set out in our privacy notice). Additional personal data must not be collected or saved, even if provided to us.

Principle 4 - Accuracy

- *Personal data must be accurate and kept up to date.*

This means we must check the accuracy of personal data when it is collected and at regular intervals thereafter. Where any inaccurate or out-of-date data is found, we must amend or erase that data, as appropriate, without delay.

Principle 5 - Storage Limitation:

- *Personal data which permits identification of data subjects (i.e. data which has not been anonymised) must be kept for no longer than is necessary for the purposes for which the personal data are processed.*

This means personal data must not be kept for any longer than is necessary for the purpose for which we collected it. When the data is no longer required, we must securely erase or dispose of it without delay.

Principle 6 - Security:

- *Personal data must be processed in a manner that ensures its security, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage.*

This means we must protect the personal data we collect and ensure that is not disclosed to third parties without authorisation, is not altered without approval and remains available to individuals with permission to have access to it.

Principle 7 – Accountability

- *WADAC shall be accountable for ensuring compliance with its data protection obligations under the UK GDPR and DPA18.*

This means we shall meet our legal obligations as a data controller. These include, without limitation, keeping internal records of our data processing activities, implementing appropriate technical and organisational measures to ensure the security of the personal data, designating a data protection officer if required to do so by law and having contracts with our data processors.

It also means managing the privacy risks associated with the personal data we collect, carrying out data protection impact assessments where necessary and applying data protection from the 'ground up' in all activities that involve processing personal data.

3. Data Subject Rights

Data subjects have the following rights regarding the personal data that we collect and hold about them:

- The right to be informed;
- The right of access;
- The right to rectification;
- The right to erasure (also known as the 'right to be forgotten');
- The right to restrict processing;
- The right to data portability;
- The right to object;
- Rights with respect to automated decision-making and profiling.

There are strict timescales for responding to data subject rights requests and not all rights apply in all cases. All requests from a data subject to exercise their rights must be sent, without delay, to secretary@wadac.org.uk.

The Data Protection Officer is to be consulted when a data subject makes a request to facilitate his or her rights and the following process shall be followed:

1. The data subject shall be sent the WADAC Subject Rights Form (refer to Schedule 1 of 'WADAC – Data Subject Rights Policy') and asked to complete it and to provide information to verify their identity.
2. Once the form is received back, it will be reviewed to determine whether the request is valid and whether there are grounds for seeking an extension to the time available for responding.
3. If the request is not valid, this must be communicated to the data subject within one month of validation of their identity. If an extension is justified, this must be communicated to the data subject within one month of validation of their identity.
4. If the request is valid, it must be responded to within one month of validation of the data subject's identity (or within three months if an extension is justified and this has been communicated to the data subject as set out above).
5. A record of the request is to be kept along with the actions taken in responding to it.

4. International Data Transfers

Personal data must not be transferred (including making available remotely) outside of the UK unless permitted by law. In all cases, the Data Protection Officer must be consulted when any transfer is planned and, in all cases, before any transfer outside the UK takes place.

5. Data Breach Notifications

A personal data breach is a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data. Personal data breaches are very serious, and the Information Commissioner's Office may need to be notified.

All potential and actual data breaches must be reported immediately to the Club Secretary and details of the breach must be sent to secretary@wadac.org.uk without delay. All personal data breaches will be added to the register of data breaches.

If the breach is likely to result in a risk to the rights and freedoms of data subjects (e.g., financial loss, breach of confidentiality, discrimination, reputational damage, or other significant social or economic damage), then the Information Commissioner's Office must be notified of the breach without delay, and in any event, within 72 hours after having become aware of it.

If the breach is likely to result in a high risk (that is, a higher risk than that described immediately above) to the rights and freedoms of data subjects, all affected data subjects are to be informed of the breach directly and without undue delay except as otherwise required by law.

6. Associated Policies

The following policies and codes of conduct are aligned to this policy:

- WADAC Data Breach Procedure
- WADAC Data Protection by Design & DPIA Policy
- WADAC Data Retention & Destruction Policy
- WADAC Subject Rights Policy
- WADAC Data Protection Code of Conduct,

7. Implementation & Policy Management

This procedure shall be deemed effective as of 28 May 2018. No part of this procedure shall have retroactive effect and shall thus apply only to matters occurring on or after this date.

This procedure will be reviewed annually and following any significant personal data breach.

8. Version & Revision History

Version	Date	Author	Summary of Revisions
1.0	28 May 2018	P Harris	First Version
1.0	28 May 2019	P Harris	Annual Review. No Changes.
1.0	28 May 2020	P Harris	Annual Review. No Changes.
1.1	28 Jan 2021	P Harris	Revised data protection laws