



Data Protection Policy

This Data Protection Policy sets out how Fleur De Lys Football Club complies with the statutory obligations of data processing, covering collection and processing of personal information through all age groups including senior football. Further information about data protection can be found by visiting the [Information Commissioner's Office \(ICO\)](#) website.

1. Introduction

- 1.1. The Club is obligated and committed to comply with the UK General Data Protection Regulation and Data Protection Act 2018. This policy sets out our data protection responsibilities and how we deal with data protection matters.
- 1.2. This policy will be made available to all Club officials, committee members, coaches, volunteers, and others who process personal data for or on behalf of the Club.

2. Purpose

- 2.1. The Club process personal data for purposes related to the game of football.
- 2.2. This policy aims to ensure that our data processing is done without adversely affecting the rights of the individual.
- 2.3. You must comply with this policy when processing personal data on behalf of the Club and this policy will help you to understand how to handle personal data to comply with the GDPR.

3. Whose personal data we handle

- 3.1. The process personal data about current, former, and prospective players.

3.2. The Club process personal data about parents/guardians if the player is a child.

3.3. The Club process personal data about officials, committee members, coaches, volunteers, referees, managers, contractors, third parties, suppliers, and other individuals that we may communicate with,

4. Data Protection Principles

4.1. Anyone processing personal data for, or on behalf, of the Club must comply with the principles of the GDPR. The principles are:

- Data is processed lawfully, fairly, and in a transparent manner
- Data is processed with specific and explicit purpose
- Data is limited to what is necessary for the purpose
- Data is accurate and up to date
- Data is kept no longer than is necessary
- Data is protected using both technical and organisational measures

4.2. The Club is responsible for and must be able to demonstrate compliance with the data protection principles listed above.

5. Lawful Processing

5.1. Lawful processing means data must be processed with a legal basis as set out in the GDPR.

5.2. The following table sets out ways the Club plan to use personal data, and the lawful basis to do so.

Activity	Lawful basis
Processing player information, including payment of club and registration fees	Performance of a contract
Organising matches and events	Performance of a contract
Communicating club information and updates	Performance of a contract
Sharing data with officials, coaches, volunteers to deliver training sessions or participate in events	Performance of a contract
Sharing data with Leagues, Divisional Associations to deliver the sport of football	Performance of a contract
Sharing data with committee members to provide information about community and social events	Legitimate interest for operational purposes

Sharing data with a partner as a condition of funding	Legitimate interest for operational purposes
Sharing data with legal, statutory, regulatory bodies	Legal basis to comply with a legal obligation
Publishing match and league results	Consent to publish your personal data in a public domain including name and image. In the case of children under the age of 18 then only with written consent from parent/guardian
Sending out marketing information about promotions and offers from sponsors	Consent to send you direct marketing
Health and medical information	Consent to process details on your medical history including sharing information at the appropriate level
Processing children's information	Performance of a contract in the case of children under the age of 18 with written consent from parent/guardian

6. Purpose Limitation

- 6.1. The Club will only process personal data for the explicit and defined purposes or as permitted by the UK GDPR.
- 6.2. You may only process personal data if required to do so in an official capacity with the Club. The Club cannot process personal data for any reason unrelated to its duties.
- 6.3. The Club will ensure that when personal data is no longer needed for the defined purposes for which it was collected, that it is securely disposed of/ deleted.

7. Accurate data

- 7.1. We will ensure that personal data we hold is accurate and kept up to date. We will check the accuracy of any personal data at the point of collection and at the start of each season.

8. Data security

- 8.1. We will take appropriate security measures against unlawful or unauthorised processing of personal data, and against the accidental loss of, or damage to, personal data.
- 8.2. Personal data will only be transferred to another party to process on our behalf where we have a written data processing agreement/contract in place with that party.

8.3. We will maintain data security by protecting the confidentiality, integrity and availability of the personal data.

9. Reporting a personal data breach

9.1. In the case of a personal data breach, we may need to notify Information Commissioner's Office (ICO).

9.2. If you suspect that a personal data breach has occurred, inform a member of the committee immediately. This can be done through contacting the club via <https://fleur-de-lys-football.co.uk/contact/>.

10. Data subject's rights

10.1. All individuals, as data subjects, have rights under the GDPR including:

- The right to be informed
- The right to request access to any data held about them
- The right to object to processing of their data
- The right to have inaccurate or incomplete data rectified
- The right to be forgotten (deletion or removal of personal data)
- The right to restrict processing
- The right to data portability
- The right to not be subject to a decision which is based on automated processing

10.2. The Club is aware that any requests regarding the above should be immediately reported to the Clubs nominated Data Protection Officer.

11. Privacy Notices and Privacy Statements

11.1. At the point where we collect personal data we will inform the data subject of the defined purpose as to why we are collecting the data, and how and what we will be using the personal data for.

11.2. The Club Privacy Statements will set out the lawful basis for processing personal data.

11.3. Where we collect personal data directly from individuals, we will inform them about:

- What personal data the Club processes
- Who the Club collects personal data from
- Why and on what lawful basis the Club

- How long the Club will hold the personal data for, and
- Refer to this Data Protection Policy

12. Subject Access Requests (SAR)

- 12.1. Individuals have the right to and may make a formal request for information we hold about them. Anyone who receives such a request should forward it to the Club Committee via richard@fleurdelysfc.cymru
- 12.2. The Club must respond to any subject access requests within 1 calendar month (30 days) from the date of the request being received.
- 12.3. The Club will only disclose personal data if we have checked the individual's identity to make sure they are entitled to the information requested.

13. Consent

- 13.1. The Club may process personal data by obtaining individual's consent.
- 13.2. An individual gives consent to processing their personal data if they clearly indicate specific and informed agreement to the processing, either by a statement or positive action.
- 13.3. Individual's must be able to withdraw consent at any time and the withdrawal must be carried out by the Club.
- 13.4. Explicit consent will be required for processing any special category personal data.
- 13.5. Where children are involved then the consent must be in writing from the child's parent/guardian.
- 13.6. Where consent is our legal basis for processing, the Club will need to keep records of when and how this consent was captured.

14. Special category data

- 14.1. Special category data is personal data which the GDPR says is more sensitive, and so needs more protection. Information about an individual's health is more sensitive, and so needs more protection.
- 14.2. When processing special category personal data, additional protection and conditions must be met.

15.Children's data

- 15.1. When handling children's personal data we give special consideration to safeguarding and data protection measures.

16.Sharing personal information

- 16.1. We may share personal data with Club/League and Association/FAW using secure methods.
- 16.2. We may share personal data with third parties or suppliers for the services they provide and instruct them to process our personal data on our behalf. Where we share data with third parties, we will ensure we have a compliant written contract in place incorporating the minimum data protection terms as set out in the GDPR. This may be in the form of terms of service with the third party.

17.Accountability

- 17.1. The Club must implement appropriate technical and organisational measures to look after personal data, and is responsible for, and must be able to demonstrate compliance with the data protection principles.
- 17.2. The Club must have adequate resources and controls in place to document and to ensure GDPR compliance. These include providing privacy notice at all points of data capture, providing training on data protection and this policy, and regularly reviewing data protection measures.

18.Changes to this policy

- 18.1. We reserve the right to change this policy at any time. Where appropriate we will communicate the changes to you.

19.Responsibilities

- 19.1. The Club will be responsible for ensuring compliance with this policy. Any queries about this policy or data protection matters should be referred to the nominated Data Protection Officer, Dave Parsons.