

EDINBURGH AIKIDO CLUB

DATA PROTECTION POLICY & PROCEDURES

17 December 2021

1. DEFINITIONS

- 1.1 Personal data is information about a person which is identifiable as being about them. It can be stored electronically or on paper, and includes images and audio recordings as well as written information.
- 1.2 Data protection is about how we, as an organisation, ensure we protect the rights and privacy of individuals, and comply with the law, when collecting, storing, using, amending, sharing, destroying or deleting personal data.

2. RESPONSIBILITY

- 2.1 Overall and final responsibility for data protection lies with the Management Committee, who are responsible for overseeing activities and ensuring this policy is upheld.
- 2.2 All Committee members are responsible for observing this policy, and related procedures, in all areas of their work for the Club.

3. OVERALL POLICY STATEMENT

- 3.1 The Edinburgh Aikido Club ('the EAC') needs to keep personal data about its Committee and members in order to carry out the Club's activities. The EAC shall be the Data Controller.
- 3.2 We will collect, store, use, amend, share, destroy or delete personal data only in ways which protect people's privacy and comply with the General Data Protection Regulation (GDPR) and other relevant legislation.
- 3.3 We will only collect, store and use the minimum amount of data that we need for clear purposes, and will not collect, store or use data we do not need or for purposes other than that which the data was gathered for.
- 3.4 We will only collect, store and use data for:
 - purposes for which the individual has given explicit consent, or
 - purposes that are in our our group's legitimate interests, or
 - contracts with the individual whose data it is, or
 - to comply with legal obligations, or
 - to protect someone's life, or
 - to perform public tasks.
- 3.5 We will provide individuals with details of the data we have about them when requested by the relevant individual, who should contact the Membership Secretary or the Club Secretary regarding this.
- 3.6 We will delete data if requested by the relevant individual, unless we need to keep it for legal reasons. Individuals who wish their data deleted should contact the Membership Secretary or the Club Secretary regarding this.

- 3.7 We will endeavour to keep personal data up-to-date and accurate.
- 3.8 We will store personal data securely.
- 3.9 We will keep clear records of the purposes of collecting and holding specific data, to ensure it is only used for these purposes.
- 3.10 We will not share personal data with third parties without the explicit consent of the relevant individual, unless legally required to do so.
- 3.11 We will endeavour not to have data breaches. In the event of a data breach, we will endeavour to rectify the breach by getting any lost or shared data back. We will evaluate our processes and understand how to avoid it happening again. Serious data breaches which may risk someone's personal rights or freedoms will be reported to the Information Commissioner's Office within 72 hours, and to the individual concerned.
- 3.12 To uphold this policy, we will maintain a set of data protection procedures for our committee and volunteers to follow.

4. DATA PROTECTION PROCEDURES

4.1 INTRODUCTION

- (a) The Edinburgh Aikido Club ('the EAC') has a data protection policy which is reviewed regularly. In order to help us uphold the policy, we have created the following procedures which outline ways in which we collect, store, use, amend, share, destroy and delete personal data.
- (b) These procedures cover the main, regular ways we collect and use personal data. We may from time to time collect and use data in ways not covered here. In these cases we will ensure our Data Protection Policy is upheld.

4.2 GENERAL PROCEDURES

- (a) Data will be stored securely. When it is stored online in a third party website (e.g. Google Drive) we will ensure the third party comply with the GDPR. When it is stored on paper it will be stored in a reasonably secure location.
- (b) When we no longer need data, or when someone has asked for their data to be deleted, it will be deleted securely. We will ensure that data is permanently deleted from computers, and that paper data is destroyed.
- (c) We will keep records of consent given for us to collect, use and store data. These records will be stored securely.

4.3 MAILING LIST

- (a) We will maintain a mailing list. This will include the names and contact details of people who wish to receive communications from the Edinburgh Aikido Club ('the EAC').

- (b) When people sign up to the list, we will explain how their details will be used, how they will be stored, and that they may ask to be removed from the list at any time. We will only send them messages which they have expressly consented to receive.
- (c) We will not use the mailing list in any way that the individuals on it have not explicitly consented to.
- (d) We will provide information about how to be removed from the list with every mailing.

4.4 SUPPORTING INDIVIDUALS

- (a) Details relating to individual’s circumstances will be treated as strictly confidential.

4.5 CONTACTING MEMBERS

- (a) The privacy notice each member listed in the Club's Register will have agreed to when registering authorises the EAC to contact them as part of the running of the Club.

4.6 CONTACTING COMMITTEE MEMBERS

- (a) The Committee members need to be in contact with one another in order to run the organisation effectively and ensure its legal obligations are met.
- (b) Committee contact details will be shared among the Committee.
- (c) Committee members will not share each other’s contact details with anyone outside of the Committee, or use them for anything other than the EAC business, without explicit consent.

5. REVIEW

This policy will be reviewed every two years.

Date
 Signature (Chair)
 Signature (Secretary)