



# Data Protection Policy.

## About this Policy

- This Policy is to help Crewe Town FC deal with data protection matters internally. The Policy should be given (or made available) to all volunteers and others who come into contact with personal data during the course of their involvement with Crewe Town FC
- Crewe Town FC handle personal data about current, former and on occasions prospective players (and their parents or guardians), volunteers, committee members, coaches, third party suppliers and other individuals that we communicate with.
- In your official capacity with Crewe Town FC, you may process personal data on our behalf and we will process personal data about you. We recognise the need to treat all personal data in an appropriate and lawful manner, in accordance with the General Data Protection Regulation 2016/679 (**GDPR**).
- Correct and lawful treatment of this data will maintain confidence in Crewe Town FC, and protect the rights of players and any other individuals associated with Crewe Town FC. This policy sets out our data protection responsibilities and highlights the obligations of Crewe Town FC, which means the obligation of the committee, volunteers and any other organisation acting on behalf of Crewe Town FC.
- You are obliged to comply with the policy when processing personal data on behalf of Crewe Town FC, the club committee will be responsible for ensuring compliance with this policy. Any questions about this policy or data protection concerns should be referred to the committee.
- We process committee, volunteer and third-party personal data for administrative and Crewe Town FC management purposes. Our purpose for holding personal data is to be able to contact the relevant individuals regarding club business, and our legal basis for processing your personal data in this way is the contractual relationship we have with you. We will keep this data for 1 month after the end of your official relationship with Crewe Town FC, unless required otherwise by law, or regulatory requirements. If you do not provide your personal data for this purpose, you will not be able to carry out your role or the obligations of your contract with Crewe Town FC.

## What we need from you.

Please help us to comply with the data protection principles (set out briefly in further details below):

- Please ensure that you only process data in accordance with our transparent processing as set out in our privacy notice;
- Please only process personal data for the purposes of which we have collected it.
- Please do not ask for further information about players or volunteers without first checking with the club committee.
- If you are asked to correct an individual's personal data, please make sure that you can identify that individual and, where you have been able to identify them, make the relevant updates on our records and systems.
- Please treat all personal data as confidential. If it is stored in electronic format then please consider whether the documents themselves should be password protected or whether your personal computer is password protected and whether you can limit the number of people who have access to the information. Please also consider any cloud storage provider. Please make sure all hard copies are stored correctly and not kept in cars overnight.
- If you are looking at using a new electronic system, please talk to the club committee first so it can be decided whether such a system is appropriately secure and complies with GDPR.
- If you are planning on sharing personal data with anybody outside of the FA structure, please speak to The club committee before doing so, he will be able to check that the correct contractual provisions are in place.
- If you think there has been a data breach, please speak to the club committee who will be able to help you respond.

- If you have any questions at any time then please just ask the club committee. We are here to help.

### 3.Data protection principles.

- Anyone processing personal data must comply with enforceable principles of data protection. Personal data must be:
- Processed lawfully, fairly and in a transparent manner;
- Collected for only specified, explicit and legitimate purposes;
- Adequate, relevant and limited to what is necessary for the purpose(s) for which it is processed;
- Accurate and where necessary, kept up to date;
- Kept in a form which permits identification of individuals for no longer than is necessary for the purpose(s) for which it is processed;
- Processed in a manner that ensures its security by appropriate technical and organisational measures to protect against unauthorised or unlawful processing and against accidental loss, destruction or damage;
- We are responsible for and must be able to demonstrate compliance with the data protection principles listed above.

### 4. Fair and lawful processing

- This policy aims to ensure that our data processing is done fairly and without adversely affecting the rights of the individual.
- Lawful processing means data must be processed on one of the legal bases set out in the GDPR. When special category personal data is being processed, additional conditions must be met.

### 5. Processing for limited purposes.

- Crewe Town FC collects and processes personal data. This is data. This is data we receive directly from an individual and data we may receive from other sources.
- We will only process personal data of the purpose of Crewe Town FC as instructed by the committee, the county FA or the FA, or as specifically permitted by the GDPR. We will let individuals know what those purposes are when we first collect data or as soon as possible thereafter.

### 6. Consent

- One of the lawful bases on which we may be processing data is the individual's consent.
- An individual consents to us processing their personal data if they clearly indicate specific and informed agreements, either by a statement or positive action.
- Individuals must be easily able to withdraw their consent at any time and withdrawal must be promptly honoured. (Consents should be refreshed every season).
- Explicit consent is usually required for automated decision-making and for cross-border data transfers, and for processing special category personal data. Where children are involved then the consent must be in writing from parent/guardian.
- Where consent is our legal basis for processing, we will need to keep records of when and how this consent was captured.
- Our Privacy Notice sets out the lawful bases on which we process data of our players and members.
- Where we collect personal data directly from individuals, we will inform them about, the purpose for which we intend to use it, the legal basis which we are processing that data, the types of third parties, if any, with which we will share that personal data, their rights as data subjects, the period for which the data will be stored.
- We will also inform those whose personal data we process that we, Crewe Town FC, are the data controller in regard to that data, and which individuals in Crewe Town FC are responsible for data protection.

## 7. Accurate data

- We will ensure that personal data we hold is accurate and kept up to date. We will check the accuracy of personal data at the point of collection and at the start of each season.
- We will take all reasonable steps to destroy or amend inaccurate or out-of-date data.

## 8. Processing in line with data subject's rights

- As data subjects, all individuals have the right to:
- Be informed of what personal data is being processed
- Request access to any data held about them by a data controller
- Object to processing of their data for direct marketing purposes (including profiling)
- Ask to have inaccurate or incomplete data rectified;
- Not be subject to a decision which is based on automated processing

## 9. Disclosure and sharing of personal information.

- We share personal data with Cheshire FA, and with applicable leagues using Whole Game System.
- We may share personal data with third parties or suppliers for the service they provide. Where we share data with third parties, we will ensure we have a compliant written contract in place incorporating the minimum data processed terms as set out in the GDPR.
- We may share personal data if we are under a duty to disclose an individual's personal data in order to comply with any legal obligation, or to enforce or apply any contract with the individual or other agreements; to protect our rights, property, or safety of our volunteers, players and other individuals associated with the Crewe Town FC.

## 10. Accountability

- Crewe Town FC 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.
- Crewe Town FC must have adequate resources and controls in place to ensure and to document GDPR compliance, such as:
  - Providing fair processing notice to individuals at all points of data capture;
  - Training committee and volunteers on the GDPR, and this data protection policy; and
  - Reviewing the privacy measures implemented by Crewe Town FC.

## 11. Changes to this policy.

- The club reserves the right to change this policy at any time. Where appropriate, we will notify you by email.

Signed 3<sup>rd</sup> May 2024



John Edge - Chairman