

YORKSHIRE LADIES' COUNTY GOLF ASSOCIATION

Data Protection Policy

Our Commitment:

The Yorkshire Ladies County Golf Association hereinafter referred to as YLGCA is committed to the protection of all personal and sensitive data for which it holds responsibility as the Data Controller and the handling of such data in line with the data protection principles and the Data Protection Act (DPA).

<https://ico.org.uk/for-organisations/guide-to-data-protection/data-protection-principles/>

Changes to data protection legislation shall be monitored and implemented in order to remain compliant with all requirements.

The member(s) of the committee responsible for data protection are

Lady Captain
County Secretary
Competition Secretary
Inter Club Secretary
Junior Organiser

The YLPGA is also committed to ensuring that its committee is aware of data protection policies and legal requirements.

Notification:

Our data processing activities do not need to be registered with the Information Commissioner's Office (ICO)

Changes to the type of data processing activities being undertaken shall be notified to the membership.

Breaches of personal or sensitive data shall be notified immediately to the individual(s) concerned and the ICO.

Personal and Sensitive Data:

All data within the YLPGA's control shall be identified as personal, sensitive or both to ensure that it is handled in compliance with legal requirements and access to it does not breach the rights of the individuals to whom it relates.

The definitions of personal and sensitive data shall be as those published by the ICO for guidance: <https://ico.org.uk/for-organisations/guide-to-data-protection/key-definitions/>

The principles of the Data Protection Act shall be applied to all data processed:

1. Processed fairly and lawfully
2. Obtained only for lawful purposes, and is not further used in any manner incompatible with those original purposes
3. Accurate and, where necessary, kept up to date,
4. Adequate, relevant and not excessive in relation to the purposes for which it is processed. It shall comprise names, email address and contact telephone number only as provided in the consent form.
5. Not kept for longer than is necessary for those purposes.
6. Processed in accordance with the rights of data subjects under the DPA
7. Protected by appropriate technical and organisational measures against unauthorised or unlawful processing and against accidental loss, destruction or damage. Stored in a password protected online file with passwords known to the three committee members cited above
8. Not transferred to a country or territory outside the European Economic Area unless that country or territory ensures an adequate level of protection of the personal information

Fair Processing / Privacy Notice:

We shall be transparent about the intended processing of data and communicate these intentions via notification to members.

Personal data will not be shared with any third parties without the individual's express permission it is a legal requirement to provide such information.

Any proposed change to the processing of individual's data shall first be notified to them.

Data Security:

In order to assure the protection of all data being processed and inform decisions on processing activities, we shall undertake an assessment of the associated risks of proposed processing and equally the impact on an individual's privacy in holding data related to them.

Risk and impact assessments shall be conducted in accordance with guidance given by the ICO:

<https://ico.org.uk/for-organisations/guide-to-data-protection/principle-7-security/>
<https://ico.org.uk/for-organisations/guide-to-data-protection/principle-7-security/>
<https://ico.org.uk/about-the-ico/news-and-events/news-and-blogs/2014/02/privacy-impact-assessments-code-published/>

Security of data shall be achieved through the implementation of proportionate physical and technical measures. The committee shall be jointly responsible for the effectiveness of the controls implemented and reporting of their performance

The committee shall meet twice per year to review the accuracy of the data and to remove records deemed to be obsolete.

Data Access Requests (Subject Access Requests):

All individuals whose data is held by us, has a legal right to request access to such data or information about what is held. We shall respond to such requests within 40 days and they should be made in writing to: The Secretary

Photographs and Video:

Images of members may be captured at appropriate times and as part of promotional material connected purely with YLCGA

Unless prior consent from members, the YLCGA shall not utilise such images for publication or communication to external sources.

It is the YLCGA's policy that external parties may not capture images of members' activities without prior consent.

Data Disposal:

The YLCGA recognises that the secure disposal of redundant data is an integral element to compliance with legal requirements and an area of increased risk.

All data shall be destroyed or eradicated to agreed levels meeting recognised national standards, with confirmation at completion of the disposal process.

Disposal of IT assets holding data shall be in compliance with ICO guidance: