



The notice will be reviewed on an annual basis or when a change in legislation and/or practices dictates and any changes will be notified to you by posting an updated version on our websites and/or by contacting you via email.

We recommend that you regularly check for changes and review this Notice when visiting our website.

## 1. Introduction

The Lordswood Rugby Football Club (LRFC) is committed to protecting your privacy. We take your privacy seriously.

If you have any concerns or questions relating to this notice, including how to update or access your personal information or to make a complaint, you will find our contact details in the Contact Us section below.

We are providing this privacy notice so you know who we are and what we do with any personal information we may collect.

This Privacy Notice explains:

- Who is Lordswood Rugby Football Club (LRFC) are
- What personal information we collect from you when you visit any of our websites, contact us or make an enquiry
- How we use cookies and other technology
- How we collect, store and share personal information
- How we keep your personal information secure
- Your rights in relation to your personal information
- How you can make a Subject Access Request
- How you can make a complaint to the Information Commissioners Office (ICO)

By providing us with your information you consent to Commercial Services Group using your personal data as described in this notice.

### 1.1 Who We Are

Lordswood Rugby Football Club  
North Dane Way  
Chatham  
Kent  
ME5 8YE

#### Contact Us

If you have any questions, suggestions or complaints about the processing of your personal information please contact our Data Protection Officer (DPO) via email at [paulstears@hotmail.co.uk](mailto:paulstears@hotmail.co.uk) or in writing by using the address below:



Data Protection Officer  
Lordswood Rugby Football Club  
North Dane Way  
Chatham  
Kent  
ME5 8YE

## 2. How we collect Personal Information

We may collect personal information in the following ways:

When you contact us by telephone, email, post or fax and also when you visit our websites.

The type(s) of information collected is likely to include your name, your contact details which could include your telephone number, email address and postal address.

When you visit our websites or social media pages your personal information may be automatically collected by our web servers and/or cookies. This information could include your IP address, the date and the pages that you visit.

Calls may be recorded for training purposes, quality control and for the purpose of capturing details about your enquiry.

## 3. What Personal Information are we collecting

In order for Lordswood Rugby Football Club (LRFC) to provide its service it may be necessary for us to collect, maintain and process personal information about you.

Personal information we may collect includes the following:

- Your full name and contact information (including but not limited to, telephone number, email address, postal address, delivery address, job title and type of business/company)
- Bank account details
- Payment card details
- User names and account passwords (may be required when registering and/or login onto our websites)
- The details of your enquiry any correspondence or complaint
- The date you contacted us
- Your social media user name
- Age and date of birth
- Gender
- Photograph
- Passport / driving licence or ID card



- Nationality
- DBS check
- Criminal conviction check

#### 4. Why we are collecting this information

We collect your personal information in order to:

- To manage payments
- Communicate with you
- As required by the Club to conduct our business and pursue our legitimate interests, in particular
- We will use your information to manage and administer your membership and your involvement with its teams and club, and to keep in contact with you for these purposes
- We will also use data to maintain records of our performances and history, including match reports, score lines and team sheets; o we use CCTV cameras to maintain the security of our premises, and may use this video to investigate incidents at the Club or its premises
- We may choose to send you promotional materials by email where we want to send you offers relating to similar products and services that you have already bought

#### 5. Where you give consent

- We will send you direct marketing or promotional material by email
- We may handle medical or disability information you or your parent provides to us, to ensure we support you appropriately
- On other occasions where we ask you for consent, we will use the data for the purpose which we explain at that time
- We will also use data to maintain records of our performances and history, including match reports, score lines and team sheets
- We use CCTV / Video cameras to record matches and may use this video to investigate incidents at the Club or its premises

#### 6. For purposes which are required by law

- We maintain records such as health and safety records and accounting records in order to meet specific legal requirements
- We may respond to requests by government or law enforcement authorities conducting an investigation



## 7. Our Legal Bases to processing your Personal Information

There are a number of different legal bases that we may use in order to collect and/or process your personal information. These are listed below;

### Consent

We will collect and process your personal information with your consent when registering as a Lordswood Rugby Football Club (LRFC) member. You may withdraw your consent at any time by contacting the Data Protection Officer (DPO)

### Legal Obligation

We will use your personal information to comply with our legal obligations. This may mean that we need to provide your personal information to HMRC, If requested we will provide the police with personal information to assist them with investigations.

### Vital Interest

We may use your personal information should we need to contact you about an emergency. This will be done with the intention of informing a responsible person.

### Legitimate Interest

We may use and process your personal information where we wish to pursue our legitimate interest as a Rugby football Club and in a way that you might reasonably expect us to do so. These interests are:

- To communicate and correspond with you
- To manage your enquiries and to respond to a complaint.
- To assist us in the technical administration of our websites.

## 8. Rights of Access to your Personal Information

Under current data protection law, you as an individual, have a number of rights in relation to the personal information we hold on you.

We may ask you to verify your identity or request more information about you in order for us to fulfil your request.

### 8.1 Your Right to Correcting and Updating your Personal Information

If any of the information we hold about you, is inaccurate or out of date please contact the Data Protection Officer (DPO) to make the changes.



## 8.2 Your Right to Erase your Personal Information

You may ask for your personal information to be erased from our systems by emailing the Data Protection Officer (DPO) or by post to  
Data Protection Officer,  
Lordswood Rugby Football Club  
North Dane Way  
Chatham  
Kent  
ME5 8YE

We will comply with your request unless there is a lawful reason for us to continue to use and process your personal information

## 8.3 Your Right to Restrict Processing of your Personal Information

You have the right to restrict the processing of your personal information in the following circumstances

- Where you contest the accuracy of the personal information we hold on you
- Where you believe your personal information has been unlawfully processed
- Where you believe we no longer require your personal information for processing purposes or you require us to retain the information in order to establish, exercise or defend a legal claim

## 8.4 Your Rights to the Portability of your Personal Information

Your right to data portability allows you to obtain and re-use the personal information we hold on you for your own purposes. You can ask us to transfer your personal information directly to another Rugby Football Club where technically feasible.

## 8.5 Your Right to Object to the Processing of your Personal Information

You have a right to object about how we process your personal information on the following grounds;

- Processing based on legitimate interest
- Processing based on performing a task in the public interest including profiling
- Direct marketing

You can exercise your right to object by emailing the Data Protection Officer (DPO) or by post to  
Data Protection Officer,  
Lordswood Rugby Football Club  
North Dane Way  
Chatham  
Kent  
ME5 8YE



## 8.6 Your Rights Relating to Automated Decision Making (including profiling)

You have a right to understand and object to any automated decision making and/or profiling that is being carried out on your personal information.

You will need to make your request in writing to us and send your request to Data Protection Officer (DPO) or by post to  
Data Protection Officer,  
Lordswood Rugby Football Club  
North Dane Way  
Chatham  
Kent  
ME5 8YE

## 9. Right to lodge a Complaint

You have a right to make a complaint with the supervisory authority if you have any concerns about the collection or processing of your personal information. The supervisory authority is the Information Commissioners Office (ICO) whose contact details can be found on their website [ico.org.uk/](https://ico.org.uk/).

## 10. How we protect your Personal Information

We take the protection of your personal information seriously and will treat it with care and take appropriate steps to protect it.

What we do to protect your personal information:

- Our systems, services, software and equipment meet acceptable security standards (such as Cyber Essentials)
- Our computers are password protected and passwords are changed regularly
- We store printed documents that contain personal information securely and ensure that they are only accessed by authorised personnel
- We securely dispose of any personal information that is no longer required
- We verify the identity of anyone requesting access to personal information prior to providing it

## 11. What special categories of Personal Data are collected?

To provide certain services it may be necessary for us to collect personal information which is more sensitive. The special categories of personal information we collect or process may include information about your;

- Race
- Ethnic origin
- Health
- Sexual orientation



The circumstances in which we handle this personal information is likely to be on the behalf of other organisations and we will be acting as a processor.

## 12. We share your Personal Information

Your personal information may be shared with our parent Lordswood Sports and Social Club where there is a good reason to do so, for example to register you as members/players. Sometimes it will be necessary for us to share your personal information with trusted third parties.

We will only provide the information that this trusted third party needs to perform the expected task.

Trusted third parties that are under contract with us have agreed to only use the personal information provided to them for the purpose specified within the contract. All trusted third parties that we work with will be expected to act within current data protection regulations.

We work closely with our third parties to ensure that your personal information is respected and protected.

## 13. Our Retention Policy

We do not retain your personal information for longer than is necessary.

The length of time we retain your personal information for will be determined by the type of information we collect and the purpose that it has been processed for and/or our obligations under other laws.

For example

Where we receive your personal information in relation to an enquiry or a complaint will be only hold this information for a reasonable time

## 14. What is Personal Data?

*According to the law, personal data means any information relating to an identified or identifiable individual; an identifiable person is one who can be identified, directly or indirectly, in particular by reference to an identification number (e.g. social security number) or one or more factors specific to his physical, physiological, mental, economic, cultural or social identity (e.g. name and first name, date of birth, biometrics data, fingerprints, DNA...)*

## 15. Summary of your rights.

You as a member have the possibility to claim several rights towards us. Such rights are listed here

- Right to be forgotten
- Right to withdraw consent
- Right to access
- Right to rectification
- Right to restriction of processing
- Right to data portability
- Right to object
- Right to lodge a complaint with a supervisory authority