

Reigate Squash Club

Policy for the processing of members' personal data on personal computers

As Reigate Squash Club ("the Club") is a volunteer-run squash club, it is acknowledged that members who undertake recognised roles on behalf of the Club (including members of the Management Committee and other members in positions of responsibility) may need to carry out limited processing of members' personal data using their own personal computers and other electronic devices. This policy sets out the conditions that must be met when such processing is undertaken.

The definition of "personal data" under the General Data Protection Regulation is complex, so for the purpose of this policy it should be assumed to cover any information relating to individual members of the Club. This would include, for example, name, date of birth, email address and telephone number, but can also cover a variety of other items.

This policy applies to the processing of personal data on computers, laptops, tablets, mobile phones and other electronic devices.

The conditions to be met are as follows:

- A password must be required to log into the account on the electronic device in which the personal data is stored. No other person, including other people in the members' household, must have access to this account.
- Files containing personal data stored on the electronic device (e.g. spreadsheets or word documents) must be encrypted using a password (which must differ from the password required to log on to the device), with the exception of when a file is downloaded and immediately deleted.
- Internet security software from a reputable supplier must be installed (and enabled) on the electronic device, including firewall and anti-virus protection.
- Members' personal data may only be stored on the electronic device if it is needed to carry out the data processing.
- Once the data processing is complete, if there is no need to retain the personal data then the personal data must then be permanently deleted from the electronic device.
- Where personal data is stored on the electronic device permanently, reasonable efforts must be made to ensure the personal data remains up-to-date.
- Personal data will only be transferred by email for club purposes. Where personal data is transferred by email, care must be taken to ensure it is sent to the correct recipient.
- An individual's personal data will no longer be available in the members directory once they leave the club.
- Emails may only be sent to Club members in line with the Club's data privacy policy. In particular, email addresses should not be copied from a Club database for the purpose of contacting members about other matters (e.g. for promoting your own personal activities or business). Members of the management committee and other members in position of responsibility with access to club databases will be required to sign a declaration stating that personal information will not be used for personal activities or business.
- Blind Carbon Copy ("BCC") should be used if appropriate when sending emails to Club members so as not to disclose their email addresses to other members. An exception to this is where the

recipients of the email may need to reply to all other recipients of the email (so-called “reply all”).

- Where a member in a position of responsibility relinquishes their role at the Club, personal data should be transferred to the member taking on the same role (if applicable) to the extent necessary and within a reasonable time period. All personal data must then be deleted immediately from the electronic device of the member who is relinquishing their role.
- If any breach, or potential breach, of personal data occurs, the steps set out in the Club’s “Data breach response plan” must be followed without delay. The “Data breach response plan” sets out details of what may constitute a personal data breach.

Review of this policy

We keep this policy under regular review. This policy was last updated in December 2019.

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December 2019