

## **Retford and District Lifesaving Club**

Last updated	April 2018
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### Definitions

<b>The Club</b>	Means Retford and District Lifesaving club affiliated to the Royal Life Saving Society UK , a registered charity.
<b>GDPR</b>	means the General Data Protection Regulation.
<b>Responsible Person</b>	means Peter Moyes
<b>Register of Systems</b>	means a register of all systems or contexts in which personal data is processed by the Club.

### **1. Data protection principles**

The Club is committed to processing data in accordance with its responsibilities under Article 5 of the GDPR.

### **2. General provisions**

- a. This policy applies to all personal data processed by the Club.
- b. The Responsible Person shall take responsibility for the Club's ongoing compliance with this policy.
- c. This policy shall be reviewed at least annually.
- d. The Club shall register with the Information Commissioner's Office as an organisation that processes personal data.

### **3. Lawful, fair and transparent processing**

- a. To ensure its processing of data is lawful, fair and transparent, the Club shall maintain a Register of Systems which shall be reviewed annually.
- b. Individuals have the right to access their personal data. Any such requests shall be dealt with in a timely manner.

### **4. Lawful purposes**

- a. All data processed by the Club must be done on a lawful bases including; consent, contract, legal obligation, vital interests, public task or legitimate interests.
- b. The Club shall note the appropriate lawful basis in its Register of Systems.
- c. Where consent is relied upon as a lawful basis for processing data, evidence of opt-in consent shall be kept with the personal data.
- d. Where communications are sent to individuals based on their consent, the option to revoke consent is clearly available, with systems in place to ensure revocation is reflected accurately in the Club's systems.

## **5. Data minimisation**

- a. The Club shall ensure that personal data are adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.

## **6. Accuracy**

- a. The Club shall take reasonable steps to ensure personal data is accurate and where necessary for its lawful basis kept up to date

## **7. Archiving / removal**

- a. To ensure that personal data is kept for no longer than necessary, the Club shall put in place an archiving policy for each area in which personal data is processed and review this policy annually.
- b. The archiving policy shall consider what data is to be retained, for how long, and why.

## **8. Security**

- a. The Club shall ensure that personal data is stored securely using modern software that is kept-up-to-date.
- b. Access to personal data shall be limited to personnel who need access. Appropriate security shall be in place to avoid unauthorised sharing of information.
- c. When personal data is deleted this should be done such that the data is irrecoverable.
- d. Appropriate back-up and disaster recovery solutions shall be in place.

## **9. Breach**

In the event of a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data, the Club shall promptly assess the risk to people's rights and freedoms and if appropriate report this breach to the ICO.