

Member Data Protection and Privacy Policy

Version 2.0 – 6th November 2018

Within this document, the words “we”, “our”, “us” or “the Club” refers to The Mundeford & District Working Men’s Club and Institute (Christchurch) Limited, trading as The Mundeford Club.

The Club aims to be as transparent as possible in terms of data storage and usage and the information below represents what we believe to be a full and accurate picture.

All staff members are now issued with a set of policy documents relating specifically to employees and this document does not apply to them.

What data do we collect and why do we collect it?

Member data

- Name and address. When a person applies for membership of the Club, their name and address will be displayed within the Club, for a period of approximately two weeks, in order that any existing member has the opportunity to object to the applicant’s suitability for membership. Should it be decided that the applicant should be declined membership, their details will be deleted once they have been informed of the decision and any monies refunded. The applicant is made aware of this before they enter into the application process whereby they are requesting us to use our established system to verify their request for membership
Legal basis: Performance of contract
- Contact data such as phone numbers and email address in order that The Club may contact you. This will only ever be for Club related matters and this data will not be passed outside the Club, unless we are required to do so by law.
Legal basis: Legitimate interest
- We send occasional emails, to those that have chosen to give us their address, to advertise upcoming events etc. We will continue to use technology to contact members in this way and we aim to move to a situation where members may opt in or out of specific types of communication.
Legal basis: Legitimate interest
- Bank account details in order that members will be able to pay yearly subscription by Standing Order.

Legal basis: Legitimate interest

- Date of birth. So that we can correctly ensure any age related benefits are passed on (e.g. reduced subscriptions for members granted on age related grounds).

Legal basis: Legitimate interest

- Vehicle details in case we need to find the owner of a vehicle in the car park e.g. in the event of a faulty alarm or damage to the vehicle

Legal basis: Legitimate interest

- Members are allocated a door card. This will have a unique number that links the card to the person on our computer system. The card can thus be returned to the holder if it is handed in having been lost

Legal basis: Legitimate interest

- All members are entitled to a “Till Card” – a card which is capable of holding credit to be spent at the bar (if desired) and which gives the bearer the members’ discount on many purchases. In order to implement the credit system, details of every purchase are stored on computer in order to maintain the correct card balance and provide an audit trail in the event of any query. Stored data relating to previous sales could be used to target advertising or special offers etc. to people who have been identified as consuming a given product and may be used for data gathering purposes to analyse spending patterns.

Legal basis: Legitimate interest

- Subscriptions data will be retained in order to maintain the Membership List and to ensure that only paid up members have active “Till cards”

Legal basis: Legitimate interest

- Sports and games data. Should you choose to take part in sports or games in or on behalf of the Club, then the relevant data may be captured and may appear within or outside of the Club e.g. darts results are available on the darts league’s website and the press may print details. Your name may appear on a trophy. Should you choose to take part in sports or games, you are accepting that this data could be used in a reasonable way, consistent with established traditions.

Legal basis: Legitimate interest

- Disciplinary record. Should any member be required to attend a disciplinary hearing following a complaint against them, then details of allegations, evidence received,

sanctions imposed, any future conditions or limitations imposed on the member will remain on file for the period of their membership. If the nature of an upheld complaint involves violence or other illegal or antisocial activity then data may be passed to either the Police and/or the operators of the “Pubwatch” scheme or any other official bodies that might come into being with a similar related role in the future.

Legal basis:

a) When a criminal act may have been committed: Legal obligation

b) For breaches of the Club’s internal rules and bye-laws: Legitimate interest

- Photographs and video recordings. Photographs or videos are sometimes taken at Club events whether officially or by individuals ad hoc. Such photos or videos could be used for publicity purposes (e.g. the Club website) but will not deliberately identify any individual without their prior permission.

Legal basis: Legitimate interest

- Any “vital interest” data you wish us to hold for example details of any allergies or medical conditions you have or persons to contact in the event of an emergency.

Legal basis: Vital interest

Anonymous demographic data (e.g. average age, percentage of female members, how many members under 30 etc.) might also be used to help the Club make decisions to better serve our membership.

We reserve the right to collect additional data, with consent, in the future, as may be required. For example, we may decide to hold details of members with particular skills that would be willing to help the Club if required.

CCTV

The Club uses CCTV. We do this in order that we can, in the event of any incident, use the footage either for an internal disciplinary/grievance procedure or pass it on to the Police for investigation

This footage is only ever accessed in the event of an incident that might have disciplinary/grievance or legal consequences and no other use is made of the data.

Legal basis:

a) When a criminal act may have been committed: Legal obligation

b) For breaches of the Club’s internal rules and bye-laws: Legitimate interest

What are people told when they provide us with their data?

They will be directed to review this Privacy Policy on the Club website. A paper version will be made available to those who wish to receive it.

Where is the data kept and for how long?

Member data is maintained on the Club premises. These offices used are locked at all times when empty and keys are issued only to those with a genuine need for access. Computers are password protected. Filing cabinets are fitted with locks.

At the time of writing, all electronic data is stored locally but the Club reserves the right to use cloud based storage, if appropriate, in the future.

CCTV data is stored on hard disc. The data is constantly being overwritten by new data and we believe there will never be any image stored that is older than three months. This data is not retained unless there is an incident in which case a video file may be downloaded onto a PC, memory stick or written to a DVD or other data storage device. The unit is password protected and that password is only revealed on a need-to-know basis.

Member data will only be retained for as long as it is required by the Club.

Resignation of a member – in the absence of any ongoing issues (e.g. the member owing money to the Club) then their data will be removed as soon as is practicably possible with a maximum target time of two weeks.

Note that data stored regarding purchases a member may have made at the bar are controlled by the till system and may remain in place. We have no control over this behaviour.

Death of a member – if the member has a surviving partner then they will be offered the chance to take over the person's membership and this process will usually involve the contact details we have stored. Naturally we would wish to give the surviving partner a period of grieving before approaching them on this matter. We might therefore retain a deceased member's details until the next round of subscriptions are due to be paid when this offer can be made. If those subscriptions are due shortly after the member's death, then we will wait until the following year. Deceased member data may therefore be retained for up to 15 months in extreme case.

Lapsed member – i.e. the person has not made their annual subscription payment by the end of January. This is often not deliberate and may be caused by illness, holiday, work

commitment or simply forgetting and members are frequently seeking to make payments that they forgot in January.

We also sometimes have the situation where a person completely forgets one year then turns up to pay subscriptions the following year. So we need to retain this data for longer than that. We will therefore keep details of potential lapsed members until the end of April the following year before deletion unless it is known for certain that the member does not wish to continue their membership. A maximum period therefore of 15 months.

Expulsion of a member – Should a member have their membership cancelled and a ban placed on them from entering the premises then their details will be retained on a list of excluded members, in order to make this information available to future Committees.

Removal of data

Data held electronically will be deleted in the normal fashion. Paper based records are shredded. If the quantities being destroyed are considerable, the shredded paperwork is removed and incinerated by a professional document disposal company.

Who do we share the data with?

We share data only in the following ways:

- Where we are legally obliged to do so e.g. an incident where the Police become involved or other civil proceedings ensue
- Sports and games data will be shared in a manner consistent with long established traditions e.g. data may be given to the press, League bodies, recorded in photographs or on trophies etc.
- Vital Interest data – we would pass on any known medical information to a medical professional, on your behalf, in the event of an emergency
- Photographs or videos might be used for publicity purposes
- Name and address data for new applicants for membership will be displayed for purposes of existing members vetting the application

General policy

We will attempt always to retain the minimum amount of data about individuals and will attempt to remove any duplicate data we identify. When we no longer need data, we will remove it.

We will ensure that any staff with access to data are familiar with our data policy and the privacy requirements on them.

We will limit access to private data to those that need it to go about their duties.

Your rights

The law extends everyone certain rights with regard to data held about them such as the right to have incorrect data amended. Should you wish to exercise any of your rights under the law then please address your request to the Club's Compliance Officer, as detailed below. Not all the individual rights apply to all legal bases for holding data and in certain circumstances requests can incur a charge or can (and sometimes must) be legitimately refused. Full details may be found on the website of the Information Commissioner's Office (www.ico.org.uk).

Data protection compliance

Our appointed compliance officer in respect of our data protection activities is:

THE SECRETARY
The Mundeford Club,
161-163 Stanpit,
Christchurch,
BH23 3LY.

Email: mundefordmens@gmail.com

Telephone: 01202 484928