# **GDPR & Privacy Policy**

# **Aims**

GDPR stands for General Data Protection Regulation and replaces the previous Data Protection Directives that were in place. It was approved by the EU Parliament in 2016 and comes into effect on 25th May 2018.

GDPR states that personal data should be **‘*processed fairly & lawfully’*** and **‘*collected for specified, explicit and legitimate purposes*** and that individuals’ data is not processed without their knowledge and are only processed with their ‘explicit’ consent. GDPR covers personal data relating to individuals.

Rossendale Drum Majorettes is committed to protecting the rights and freedoms of individuals with respect to the processing of children's, parents, visitors, and staff personal data.

The Data Protection Act gives individuals the right to know what information is held about them. It provides a framework to ensure that personal information is handled properly. Rossendale Drum Majorettes is committed to protecting its members and their declared next of kin’s personal information.

The legislation sets out various data protection principles, these include that personal information is:

* Used fairly and lawfully.
* Used for limited, specifically stated purposes.
* Used in a way that is adequate, relevant, and not excessive.
* Accurate.
* Kept for no longer than is necessary.
* Kept safe and secure; and
* Not transferred outside the European economic area without adequate protection.

# **What personal data does Rossendale Drum Majorettes collect?**

The data we routinely collect includes members Names, Addresses, Contact Details, Email Address(s), Health conditions, Current list of medication, Allergies, Emergency Contact information and Gender**.** We collect this data directly from our members when they join the club via our emergency contact information sheet.

For some of our members we may have additional information such as [DBS checks](https://www.gov.uk/dbs-check-applicant-criminal-record) for our committee memberships, done with the member’s knowledge and permission.

We collect photos, videos and audio clips from events and training sessions, which are displayed on our Facebook Page (RDMajorettes) and Instagram page (rossendale\_drum\_majorettes) also used on our marketing materials.

# **What is this personal data used for?**

We use our members’ data for the administration of your membership, the communication of information, and the organisation of events. We provide your data to emergency service’s personnel only in the event of a medical/security emergency you may encounter when under RDM group supervision.

# **Who is your data shared with?**

Your membership data is only shared with the Rossendale Drum Majorette Senior Committee, who always take full responsibility in keeping your information secure and do not disclose this to any other parties.

Your personal data is not passed on by us to organisations other than those indicated above.

# **Where does this data come from?**

Data for most of our members comes from them when they join Rossendale Drum Majorettes or when you consent to us using video, photographs, or audio clips of you at Rossendale Drum Majorettes training and events.

Members are asked to provide written consent to us using their videos, photographs, or audio clips on our social media platform before we publish these.

# **How is your data stored?**

This information is mainly stored in digital form on computers (password protected) and in the form of written documents stored at 3 Ashworth Rd, Rossendale, BB4 9JE.Any information that is stored remotely is stored in the EU, in compliance with the GDPR.

# **Compliance responsibilities**

Who is responsible for ensuring compliance with the relevant laws and regulations?

Under the GDPR (General Data Protection Regulation) we do not have a [statutory requirement to have a Data Protection Officer](https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/accountability-and-governance/data-protection-officers/). The person who is responsible for ensuring Rossendale Drum Majorettes discharges its obligations under the GDPR is the Director of the group.

# **Who has access to your data?**

Members of the management committee of Rossendale Drum Majorettes have access to members’ data for them to carry out their legitimate tasks for the organisation.

# **What is the legal basis for collecting this data?**

Rossendale Drum Majorettes collects personal data that is necessary for the purposes of its legitimate interests as a membership organisation and participant in an internationally recognised and regulated, competitive sport.

For some data, such as that relating to financial matters, the basis for its collection and retention is to comply with our legal obligations.

# **How can you check what data we have about you?**

If you want to see the basic membership data we hold about you, you should contact Simon Creasey (Director) via email at [**rdmajorettes@outlook.com**](mailto:rdmajorettes@outlook.com) or via our website www. rossendaledrummajorettes.co.uk.

You can contact us with a ‘[Subject Access Request](https://ico.org.uk/for-the-public/personal-information/)’ if you want to ask us to provide you with any other information we hold about you. If you are interested in any aspects, specifying them will help us to provide you with what you need quickly and efficiently. We are required to provide this to you within 28 days of receiving your request.

There is not usually a fee for this, though we can charge a reasonable fee based on the administrative cost of providing the information if a request is manifestly unfounded or excessive, or for requests for further copies of the same information.

# **Does Rossendale Drum Majorettes collect any ‘special’ data?**

The GDPR refers to sensitive personal data as ‘special categories of personal data’.

We do notrecord any such special data/Of these categories, the only data we record relates to the disabilities of members who have explicitly requested it to be recorded for the purpose of giving them extra support whilst attending Rossendale Drum Majorette training sessions & events.If you wish to change this data on your record, you can do so at any time by contacting Simon Creasey (Director) via email at [rdmajorettes@outlook.com](mailto:rdmajorettes@outlook.com) or via our website www.rossendaledrummajorettes.co.uk.

# **How can you ask for data to be removed, limited, or corrected?**

There are various ways in which you can limit how your data is used.

* If you wish you could become an ‘anonymous’ member. This would involve a termination of your membership immediately.
* You could maintain your club membership with your correct name but with limited contact details. However, we do need to have at least one method of contacting you or an emergency contact. You could for example simply maintain an up-to-date email address, but of course this would limit what we are able to provide you with in the way of written information, so you would not be able to get information regarding Rossendale Drum Majorettes in printed form or any other benefits that require a mailing address.
* You do not need to provide us with your date of birth, but we ask that you do in the event of a medical or security emergency.
* If you do not want your information to be public, you may choose for it to be kept private. You can change this option as often as you wish.
* You may choose not to appear on our social media platforms.
* You may choose not to receive information emails from Rossendale Drum Majorettes(we do not send any out on behalf of other organisations or share your email address with external parties).
* Any of these options can be implemented for your club membership by contacting RDM via email at [rdmajorettes@outlook.com](mailto:rdmajorettes@outlook.com) or via our website www. rossendaledrummajorettes.co.uk.

# **How long we keep your data for, and why?**

We normally keep members’ data after they resign, or their membership terminates for up to 12 months in case they later wish to re-join, or we have any outstanding issues where we need your personal data. However, we will delete any former member’s contact details entirely upon request.

Since underlying data, like names, photographs, videos and audio clips continues to be necessary in relation to the purpose for which it was originally collected and processed, Information from events used by Rossendale Drum Majorettes will no longer be attributed to a member who does not want their data to be kept.

A member can request that we stop using marketing materials with their photographs on, but again this must be requested formally in written format via the email address provided.

Historical lists, trophies, medals, and prize lists are required for archiving purposes and names cannot be removed from them.

Other data, such as that relating to accounting or personnel matters, is kept for the legally required period.

Where appropriate Rossendale Drum Majorettes reserves the right to delete any information it may have on a member that could/or does bring the reputation of the group into question i.e. Photos/videos on social media platforms.

# **What happens if a member dies?**

We normally keep members’ information after they die. If requested by their next-of-kin to delete it, we will do so on the same basis as [when requested to remove data by a former member.](#Eleven)

# **Can you download your data to use it elsewhere?**

Your data such as photographs, videos or audio clips can be downloaded by other members and non-members of our Rossendale Drum Majorettes social media platforms and is something member should be aware of prior to giving consent.

We do not share personal information about our members such as contact information (name), medical conditions, medication, allergies or personal information with other members or external sources.

# **GDPR Consent forms**

A copy of our form can be found on the back of this policy and our membership/emergency contact information forms.

**Version Control**

|  |  |  |  |
| --- | --- | --- | --- |
| **Version** | **Author/Reviewer** | **Date** | **Comments** |
| RDM\_P015\_A | Simon Creasey | June 2018 | Initial Draft |
| RDM\_P015\_B | Simon Creasey | Sept 2019 | Content review |
| RDM\_P015\_C | Becky Nightingale | May 2020 | Content review and version control |
| RDM\_P015\_D | Emma Mainwaring | June 2023 | Content review |
| RDM\_P015\_E | Emma Mainwaring | June 2024 | Content review and update |

This policy will be reviewed on an annual basis as a minimum.

**GDPR Consent form**

I hereby **do / do not** *(please circle appropriately)* give my consent to allow the Rossendale Drum Majorettes to store information and obtain photographs, video’s, audio clips or personal information when undertaking activities within the group/activity or allow the obtain information to be stored or shared on social media platforms associated with the group or their marketing materials in order to promote the groups aims and objectives and to accommodate emergency personnel in the event of a medical or security situation.

I agree and understand I give Rossendale Drum Majorettes permission to post photographs, videos, audio clips of **me / my child** *(please circle appropriately)* on their social media platforms and for the use of their marketing materials which promotes the groups aims and objectives.

Should my intentions change I will give written instruction to the Director of Rossendale Drum Majorettes of my decision in line with the GDPR policy and procedures.

**Note: Once Photos/Videos are uploaded to our social media platforms or our website they are permanently deleted from the device taken from.**

|  |  |  |
| --- | --- | --- |
| Name of member | |  |
| Signature *(If above 18years of age).*  *Individual / Parent / Carer or Guardian* | | |
| Date: |  | |

* Please see privacy policy & GDPR for further information.