



# HELLINGLY RUGBY FOOTBALL CLUB C.I.C.

Lower Horsebridge, Hailsham, East Sussex. BN27 4DJ

## PRIVACY POLICY

### Summary of how the Club and the RFU use your data

- Hellingly Rugby Football Club C.I.C. (the Club) uses your personal data to manage and administer your membership and your involvement with its teams and Club and to keep in contact with you for these purposes.
- Some data is shared with the RFU, who use your data to regulate, develop and manage the game.
- Data is also shared with the Police and other official Government bodies should they be legally entitled to request it.
- Where the Club or the RFU rely on your consent, such as any consent the Club seeks for email marketing, you can withdraw this consent at any time.
- Amongst the data the Club collects from you may be medical (including injury) information. The Club will hold this where you (or your parent) have given consent, so that the Club can ensure that it is aware of your condition and can that you are supported appropriately.
- Where you work in a particular role within the game, you may be required to undergo a Disclosure & Barring Service (DBS) check using the RFU's eDBS system. The result of this check will be input into your Game Management Service (GMS) record.

1

A Community Interest Company registered in England and Wales - Company No. 10984959  
Registered Office: The Courtyard, River Way, Uckfield, East Sussex. TN22 1SL  
Registered as a Community Amateur Sports Club  
A RFU Accredited Rugby Football Club



### **What does this policy cover?**

This policy describes how Hellingly Rugby Football Club C.I.C. (also referred to as “the Club”, “we” or “us”) will make use of the data we handle in relation to our members and players, including our use of the Game Management System (“GMS”) provided by the Rugby Football Union (“RFU”). The policy also describes the RFU’s use of data on GMS.

It also describes your data protection rights, including a right to object to some of the processing which we carry out. More information about your rights, and how to exercise them, is set out in the “What rights do I have?” section.

### **What information do we collect?**

The Club collects and processes personal data from you or your parent when you join and when we carry out annual renewals of your membership. This includes:

- your name
- your gender,
- your date of birth,
- your RFU ID (as assigned in GMS)
- your home address, email address and telephone number;
- your passport and NI details, where we have to check your eligibility or ability to play for us;
- your type of membership and involvement in particular teams, or any key role you may have been allocated, such as Chair, Fixture Secretary, Membership Secretary etc.;
- your payment and/or bank account details, where you provide these to pay for membership;
- any consents you have given us, including marketing preferences;
- your medical conditions or disability, where you provide this to us with your consent (or your parent’s consent) to ensure we are aware of any support we may need to provide to you.



Some information will be generated as part of your involvement with us, in particular data about your performance, involvement in particular matches in match reports and details of any disciplinary issues or incidents you may be involved in on and off the pitch, such as within health and safety records.

### **What information do we receive from third parties?**

Sometimes, the Club receives information about you from third parties. For example, if you are a child, we may be given information about you by your parents.

We may receive information relating to your existing registrations with other clubs or rugby bodies or disciplinary history from the RFU through GMS. Additionally, for certain role holders or those working with children, we may receive information from the Disclosure and Barring Service (DBS) and RFU on the status of any DBS check you have been required to take.

### **How do we use this information, and what is the legal basis for this use?**

We process this personal data for the following purposes:

- To fulfil a contract, or take steps linked to a contract: this is relevant where you make a payment for your membership and any merchandise or enter a competition. This includes:
  - taking payments;
  - communicating with you;
  - providing and arranging the delivery or other provision of products, prizes or services;
- 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;
  - 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. You will be filmed whilst in the Club and in the proximity of the clubhouse. The Club is

3

A Community Interest Company registered in England and Wales - Company No. 10984959  
Registered Office: The Courtyard, River Way, Uckfield, East Sussex. TN22 1SL  
Registered as a Community Amateur Sports Club  
A RFU Accredited Rugby Football Club



registered with the Information Commissioners Office and a copy of the Clubs' Surveillance Camera Code of Practice is available on request from the Secretary. The ICO Registration Certificate is clearly displayed in the clubhouse.

- Where you give us consent:
  - o we may handle medical or disability information you or your parent provides to us, to ensure we support you appropriately;
  - o on other occasions where we ask you for consent, we will use the data for the purpose which we explain at that time.
- For purposes which are required by law:
  - o we maintain records such as health and safety records and accounting records in order to meet specific legal requirements;
  - o we ensure, where you will work with children, that you have undergone an appropriate DBS check – this is also carried out with your consent.
  - o where you hold a role at the Club requiring us to check your right to work, we may process information to meet our statutory duties;
  - o we may respond to requests by government or law enforcement authorities conducting an investigation.

#### **How does the RFU use any of my information?**

The RFU provides GMS, but make its own use of the following information:

- your name;
- your gender;
- your date of birth;
- your RFU ID (as assigned in GMS);
- your home address, email address and telephone number; and



- your type of membership and involvement in particular teams at the Club, or any key role you may have been allocated, such as Chair, Safeguarding Lead, Membership Secretary etc.

The RFU uses this information as follows:

- As required by the RFU to conduct its business and pursue its legitimate interests, in particular:
  - o communicating with you or about you where necessary to administer Rugby in England, including responding to any questions you send to the RFU about GMS;
  - o administering and ensuring the eligibility of players, match officials and others involved in English rugby – this may involve the receipt of limited amounts of sensitive data in relation to disabled players, where they are registered for a disabled league or team, or in relation to anti-doping matters;
  - o maintaining records of the game as played in England, in particular maintaining details of discipline and misconduct;
  - o monitoring use of GMS, and using this to help it monitor, improve and protect its content and services and investigate any complaints received from you or from others about GMS;
  - o maintaining statistics and conducting analysis on the make-up of rugby's participants;
  - o ensuring compliance with the current RFU Rules and Regulations including those on the affiliation of clubs, referee societies, constituent bodies and other rugby bodies, and registration of players; and
  - o communicating with you to ask for your opinion on RFU initiatives.
- For purposes which are required by law:
  - o The RFU will ensure, where you will work with children and where this is required, that you have undergone an appropriate DBS check – this is also carried out with your consent.

5

A Community Interest Company registered in England and Wales - Company No. 10984959  
Registered Office: The Courtyard, River Way, Uckfield, East Sussex. TN22 1SL  
Registered as a Community Amateur Sports Club  
A RFU Accredited Rugby Football Club



- o The RFU may respond to requests by government or law enforcement authorities conducting an investigation.

### **Withdrawing consent or otherwise objecting to direct marketing**

Wherever we rely on your consent, you will always be able to withdraw that consent, although we may have other legal grounds for processing your data for other purposes, such as those set out above. In some cases, we are able to send you direct marketing without your consent, where we rely on our legitimate interests. You have an absolute right to opt-out of direct marketing, or profiling we carry out for direct marketing, at any time. You can do this by following the instructions in the communication where this is an electronic message, or by contacting us using the details set out below in the “**How do I get in touch with you or the RFU?**” section.

### **QUESTIONS?**

#### **Who will we share this data with, where and when?**

Some limited information may be shared with other stakeholders in rugby, such as other clubs, the RFU, Constituent Bodies, referee societies, league organisers, so that they can maintain appropriate records and assist us in organising matches and administering the game.

Personal data may be shared with government authorities and/or law enforcement officials if required for the purposes above, if mandated by law or if required for the legal protection of our or the RFU’s legitimate interests in compliance with applicable laws.

Personal data will also be shared with third party service providers, who will process it on our behalf for the purposes identified above. Such third parties include the RFU as the provider of GMS and the Information Commissioner’s Office.

#### **What rights do I have?**

You have the right to **ask us for a copy** of your personal data; to **correct, delete or restrict** (stop any active) processing of your personal data; and to **obtain the personal data you provide to us for a contract or with your consent in a structured, machine readable format**.

In addition, you can **object to the processing** of your personal data in some circumstances (in particular, where we don’t have to process the data to meet a contractual or other legal requirement).



These **rights may be limited**, for example if fulfilling your request would reveal personal data about another person, or if you ask us to delete information which we are required by law to keep or have compelling legitimate interests in keeping.

You have the same rights for data held by the RFU for its own purposes on GMS.

To exercise any of these rights, you can get in touch with the Club or, as appropriate, the RFU or its data protection officer – using the details set out below. If you have unresolved concerns, you have the **right to complain** to the Information Commissioner's Office.

Much of the information listed above must be provided on a mandatory basis so that we can make the appropriate legal checks and register you as required by RFU Rules and Regulations. We will inform you which information is mandatory when it is collected. Some information is optional, particularly information such as your medical information. If this is not provided, we may not be able to provide you with appropriate assistance, services or support.

### **How do I get in touch with you or the RFU?**

The Club hopes that it can satisfy queries you may have about the way it processes your data. If you have any concerns about how it processes your data, or would like to opt out of direct marketing, you can get in touch at [secretary@hellinglyrugbyclub.com](mailto:secretary@hellinglyrugbyclub.com) or by writing to the address at the top of this policy.

If you have any concerns about how the RFU process your data, you can get in touch at [legal@rfu.com](mailto:legal@rfu.com) or by writing to The Data Protection Officer, Rugby Football Union, Twickenham Stadium, 200 Whitton Road, Twickenham TW2 7BA.

### **How long will you retain my data?**

We process the majority of your data for as long as you are an active member and for 3 years after this.

Where we process personal data for marketing purposes or with your consent, we process the data for 1 year unless you ask us to stop, when we will only process the data for a short period after this (to allow us to implement your requests). We also keep a record of the fact that you have asked us not to send you direct marketing or to process your data indefinitely so that we can respect your request in future.

Where we process personal data in connection with performing a contract or for a competition, we keep the data for 5 years from your last interaction with us.



We will retain information held to maintain statutory records in line with appropriate statutory requirements or guidance.

The RFU will maintain records of individuals who have registered on GMS, records of DBS checks and the resulting outcomes and other disciplinary matters for such period as is set out in the RFU's privacy notice on [www.englandrugby.com](http://www.englandrugby.com).

Records of your involvement in a particular match, on team sheets, on results pages or in match reports may be held indefinitely both by us and the RFU in order to maintain a record of the game.

A Community Interest Company registered in England and Wales - Company No. 10984959  
Registered Office: The Courtyard, River Way, Uckfield, East Sussex. TN22 1SL  
Registered as a Community Amateur Sports Club  
A RFU Accredited Rugby Football Club

8

