# **KNIGHTS OF TRINITY**

Data Protection & Privacy Policy

#### 1.0 ABOUT THIS POLICY

This policy explains when and why we (Knights of Trinity) collect personal information about our members and how we use it and keep it secure. It also describes what your rights are in relation to it. This policy covers probationary members, visitors and guests. We will collect, use and store personal data as described in this Data Protection Policy when people engage in activities at the club. Normally this will be through some level of membership.

We reserve the right to amend this Data Protection Policy from time to time without prior notice. You are advised to check our club web site regularly for any amendments. We will only ever share your personal data with any third parties as outlined in Section 4.0.

We will always comply with the General Data Protection Regulation (GDPR) when dealing with your personal data. Further details on the GDPR can be found at the web site for the Information Commissioner (www.ico.gov.uk).

# 2.0 RESPONSIBLE PERSON

For club purposes, the Lord President is considered the "owner" of this policy.

For the purposes of the GDPR, the Lord President will be the named "controller" of all personal data we hold about club members and others. The Lord President is responsible for making sure the club complies with the General Data Protection Regulation (GDPR) which applies from 25 May 2018. We will review personal data every year to establish whether we are still entitled to process it or not.

For the purposes of the GDPR, the Council and gamesmasters are identified as "processors" of information that the club holds on its members. Other third parties may hold your information on our behalf from time to time (e.g. MailChimp, the UK Nationals committee, etc.), and are also identified as "processors" in line with the regulations. A list of our third-party processors will be kept by the Lord President and updated on the club web site.

#### 3.0 MEMBER'S RIGHTS

You have rights under the GDPR:

- 1. To access your personal data
- 2. To be provided with information about how your personal data is processed
- 3. To have your personal data corrected
- 4. To have your personal data erased in certain circumstances
- 5. To object to or restrict how your personal data is processed in certain circumstances

For more details, please address any questions, comments and requests regarding our data processing practices to the Lord President.

# 4.0 SPECIFIC USE AND SHARING OF PERSONAL INFORMATION

Any email and telephone numbers you provide may be used for communication about news relating to club activities, and other important notices etc. Your personal data will not be passed to anyone else outside the club without your explicit consent, except in cases where that request is made in legitimate circumstances by a law enforcement organisation.

Gamesmasters may also process and hold information pertaining to people registered to their games and any information required from Knights of Trinity will be made available to gamesmasters only as required for the running of their game.

## 5.0 THE LAWFUL REASONS FOR PROCESSING YOUR DATA.

We have the following lawful reasons for processing your data, which are:

To carry out the normal operation of the club – namely to hold a list of gamesmasters and players, and which games they choose to play in for the purposes of setting up the games, and maintaining a track of who is playing what in case there is a need to pass messages on for absence, etc.

To manage any instances where Knights of Trinity are attending an event - e.g. the UK Student Nationals, for the purposes of carrying out the necessary registrations, any collection of fees, organisation of logistics, and any other related activities.

To assist with promotion of club activities – e.g. advice/information on a specific game system, photos used in advertising material, etc.

To manage any information linked to a complaint raised by or against a club member.

DURDOSE

#### 6.0 DATA PROCESSED WITH YOUR CONSENT

TYPE OF INFORMATION

The club will seek consent in the application form before processing any information as outlined below.

**RETENTION** 

TYPE OF INFORMATION	PURPOSE	RETENTION
Member (including probationary member as appropriate) address, telephone numbers, e-mail address	Managing the Member's membership of the club.	Until the end of the membership year following the last missed renewal date.
Photos/videos of members	Putting on the club's web site and social media pages and using in press releases and advertising materials.	Until directed by the individual.
Names of members who have performed a historically memorable act	Club Roll of Honour.	Retained permanently
Information relating to a complaint raised by or against a club member	Management of the club's complaints procedure.	One year after the resolution of the complaint.

The club may also be required to reveal personal information we process about an individual and their name, address and email address to an appropriate law enforcement organisation in line with existing legislation.

# 7.0 ENQUIRIES AND OTHER COMMUNICATIONS WITH THE CLUB

When enquiring about the club we may hold your details for a period of time to deal with the enquiry. Any emails and other communications with the club will only be retained for a period of time appropriate to the content or request. Club emails will be purged on a regular basis. People added to a club waiting list for membership will be informed and asked for consent to store that data at that point.

#### 8.0 CHILDREN

Parents or guardians signing the probationary or full membership form are giving their consent for the data to be used as described elsewhere in this policy.

# 9.0 HOW WE PROTECT YOUR PERSONAL DATA

The locations where we keep copies of your data are detailed in Section 12.0.

Your membership information will be processed electronically and held on a database in the Internet cloud. Any paper copes of data will be held at the Lord President's home address. If it is necessary to transport data it will be kept secure.

For any on-line payments which we take from members we will use a recognised online secure payment mechanism.

In the unlikely event of a breach of the security of data we will notify members promptly (within 72 hours of the discovery of the breach) and we will never sell your personal data, or pass on your personal data without your consent.

#### 10.0 REQUEST TO SEE YOUR PERSONAL INFORMATION

If you wish to know what personal data the club holds please email the Lord President and he/she will respond within 14 days of the request (depending on availability).

#### 11.0 ACCURACY AND RETENTION OF DATA

Each individual member is responsible for keeping the Council informed of changes to their data (e.g. address/telephone number etc.). This should be updated at least once a year at the time of your membership renewal and you are at that time asked to renew your consent for the club to hold such data on file. If you decline that consent, then the club will be unable to offer membership services to you after that.

Membership data will be normally be retained until the end of the membership year following your last missed renewal date (or the date you withdrew your consent). We may have to keep it for a longer period for reasons of legal or civil action, or other ongoing case management, but we will inform you if this is the case, and the data will be destroyed once it is within our ability to do so.

Names may be kept on our Roll of Honour indefinitely for reason of historical significance – e.g. for Nationals wins, and where there is a permanent record of your name – e.g. on trophies, plaques and other awards.

Complaints information will be held for a period of one year after the resolution of the complaint as per the complaint's procedure.

#### 12.0 DATA LOCATIONS

#### 12.1 Online Locations

- 1. OutSystems BlackBook <a href="https://knightsoftrinity.outsystemscloud.com">https://knightsoftrinity.outsystemscloud.com</a>
- 2. Microsoft *Teams* <a href="https://teams.microsoft.com">https://teams.microsoft.com</a>
- 3. WordPress <a href="https://www.knightsoftrinity.net">https://www.knightsoftrinity.net</a>

## 12.2 Physical Locations

1. Paper copies – Steve Ironside, 36a St Andrew Street, Aberdeen AB25 1JA.