

# **Data Protection (GDPR) Policy**

## **1. Purpose of this Policy**

This policy sets out how Erdington Gymnastics Club complies with UK data protection law, including the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

It applies to all personal data processed by the club, including data relating to members, parents/guardians, staff, volunteers, and contractors.

## **2. Data Protection Principles**

The club is committed to ensuring that personal data is:

1. Processed lawfully, fairly and transparently
2. Collected for specified, explicit and legitimate purposes
3. Adequate, relevant and limited to what is necessary
4. Accurate and kept up to date
5. Retained only for as long as necessary
6. Kept secure using appropriate technical and organisational measures

## **3. Roles and Responsibilities**

### **Data Controller**

Erdington Gymnastics Club is the data controller.

### **Data Protection Lead**

The club Welfare Officer acts as the Data Protection Lead and is responsible for:

- Overseeing compliance
- Handling data protection queries
- Managing data breaches
- Reviewing this policy regularly

### **Staff and Volunteers**

All staff and volunteers must:

- Handle personal data in accordance with this policy

- Only access data where necessary
- Keep data secure and confidential
- Report any data breaches immediately

## 4. Lawful Bases for Processing

The club processes personal data under the following lawful bases:

- **Contract** – delivering membership services and sessions
- **Legal obligation** – safeguarding, health & safety, financial records
- **Legitimate interests** – running and improving the club
- **Consent** – marketing, photography, and medical information

Special category data (e.g. health information) is processed only with explicit consent or where necessary to protect vital interests.

## 5. Data Collection and Use

The club collects only the data necessary to:

- Register and manage membership
- Ensure participant safety and wellbeing
- Communicate with members
- Organise sessions, events, and competitions
- Meet safeguarding and legal obligations

## 6. Data Sharing

The club may share personal data with:

- Service providers (e.g. LoveAdmin, GoCardless)
- Governing bodies such as British Gymnastics
- Competition organisers (where required)
- Safeguarding authorities or law enforcement (where necessary)

All sharing is carried out lawfully and securely.

## 7. Data Security

The club implements appropriate security measures, including:

- Password-protected systems
- Restricted access to authorised individuals
- Secure storage of paper records
- “Need to know” access controls

Personal data must not be stored on unsecured personal devices.

## 8. Data Retention

The club retains data only as long as necessary:

- Membership data: up to 3 months after leaving
- Financial records: 6 years
- Safeguarding records: in line with safeguarding guidance
- Medical data: only as long as required for safety

Data is securely deleted or destroyed after retention periods expire.

## 9. Individual Rights

Individuals have the right to:

- Access their personal data
- Request correction or deletion
- Restrict or object to processing
- Withdraw consent
- Data portability (where applicable)

Requests must be responded to within one month.

## 10. Data Breaches

A data breach is any loss, unauthorised access, or disclosure of personal data.

All breaches must be:

- Reported immediately to the Data Protection Lead
- Assessed promptly
- Reported to the ICO within 72 hours if required

Affected individuals will be informed where there is a high risk to their rights.

## 11. Training and Awareness

The club will ensure that:



- Staff and volunteers receive appropriate data protection guidance
- Key roles (e.g. Welfare Officer) understand safeguarding and data responsibilities

## 12. Policy Review

This policy will be reviewed annually or when required due to changes in legislation or club practices.

| Version | Date Approved | Approved By               | Next Review |
|---------|---------------|---------------------------|-------------|
| 1.0     | 10/04/2026    | Louise Combella - Manager | April 2027  |

Signed: *Louise Combella* Senior Manager: Date 10/04/2026

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## 13. Contact

For data protection queries, contact:

 [louisecombella@nbcgymnastics.org](mailto:louisecombella@nbcgymnastics.org)  
 [info@nbcgymnastics.co.uk](mailto:info@nbcgymnastics.co.uk)

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