



Data Protection Policy

*In becoming a member of **BOF**, BOF will collect certain information about you which will include your name, date of birth, gender, URN (Membership Number) number, email address, address, telephone number, name of the BOF affiliated Association and club that you are a member of, details of any coaching or officiating licences you hold, and results.*

DVO will collect and store the following information about members:

Name, BOF number, Year of Birth, Sex, Postal Address, email address, phone number, Date joined, Date lapsed, Orienteering Class, SI/EMIT numbers, mailing preferences, associated members (e.g. family members), associated clubs, details of any coaching or officiating licenses you hold and results. This is your '**membership data**'.

Why we will collect it. We will collect and process your Membership Data for the purposes of registering you as a member of DVO, administering your involvement in the sport, and communicating with you about the club and the sport. We will process it on the basis of legitimate interests. The legitimate interests are the interests of registering you as a member and to administer the sport.

We will only use your Membership Data for the purposes of registering and administering your involvement in the sport.

Data Storage. This information will be **stored** by the Membership Secretary, the Chair, and other Committee members as appropriate. The contact details (**Name, Postal Address, email address, phone number, Orienteering class**) will also be stored on the website in the members'-only section, and will be stored also by the relevant help-team leader.

Use of the Data. The **purposes** for which the data is kept is to allow contact between members, between Committee and members, and help-team leaders

and members, for the purposes of preparing for and putting on orienteering events, and the running of the club.

This may include:

Training and competition entry

- Share data with club coaches or officials to administer training sessions
- Share data with club team managers to enter event
- Share data with leagues, associations and other competition providers for entry in events

Membership and club management

- Share data with committee members to provide information about club activities or invitation to social events
- Publish race and competition results
- Use in Website management
- Use to provide DVO's and EMOA's magazines
- Communicate by the Committee to the members for reasons related to the club and the sport.
- Send club/region newsletter
- Send information about selling club kit, merchandise or fundraising

Sharing your data.

We may share relevant Membership Data with partners such as Fabian4, Stripe and Si Entries as required to enable on line entries to events, other Home Country Orienteering Organisations, Regional Associations, and third-party data managers that we may appoint as data processors as part of administering your involvement in sport.

Funding and reporting purposes

- Anonymised data shared with a funding partner as condition of grant funding e.g. Local Authority
- Anonymised data analysed to monitor club and or participation trends

The membership data will NOT be communicated to any other bodies outside DVO, except those mentioned above, unless prior explicit permission has been obtained from the member(s) concerned.

Photographic images.

DVO may also collect, store and display **images** of members in order to report on, and to promote, the sport. Images may be used on the club's, the region's or the national website, and may also be put on social media. If a member does not want images of themselves and/or their children, they should contact the Secretary to discuss how best their wishes can be complied with. Some orienteering situations may have official, even professional photographers, where different arrangements apply. Members concerned about these should contact the Organiser of the event..

Length of storage.

Membership Data (except in respect of those specific items below)
(*Some of this information may then be anonymised and kept for a longer period.*)
Six? years after an individual has ceased to be a member of the Club. However full details of the length of time any data is retained is set out in the table below marked 'Data Retention Periods'

Data kept will be in accordance with Article 5 of the Regulations and

- *"Processed fairly and lawfully*
- *Collected for specified, explicit and legitimate purposes* ¹
- *Adequate and limited to what is necessary* ²
- *Accurate and where necessary kept up to date*
- *Kept for no longer than is necessary*
- *Processed and kept in a manner that ensures appropriate security* ³
- *The Data Controller must be able to demonstrate accountability"* ⁴

1. *For specified, explicit and legitimate purposes:* This would NOT include marketing and/or promotional material from external service providers.
2. There may be occasional instances when a member's data needs to be shared with a third party, due for instance to an accident or incident involving statutory authorities. Where it is in the best interests of the member or the Club in these instances where the Club has a substantiated concern then consent does not have to be sought from the member.
3. *Secure Processing:* Committee members and team leaders of the Club have a responsibility to ensure that data is both securely held and processed.

This includes having strong passwords, not sharing passwords, and having software protection on all machines used.

4. *Accountability and Governance:* The Committee will review data protection and who has access to information on a regular basis, as well as reviewing what is held.

Your rights.

You have the following rights under data protection legislation:

1. to access a copy of the information comprising your personal data;
2. to object to processing of your personal data that is likely to cause or is causing damage or distress;
3. *to prevent processing for direct marketing*
4. *to object to decisions being taken by automated means*
5. in certain circumstances, to have inaccurate personal data rectified, blocked, erased or destroyed; and
6. to claim compensation for damages caused by a breach of data protection legislation.

(3. and 4. unlikely to be relevant with DVO)

“You agree that we may publish your Personal Information as part of the results of the Event and may pass such information to the governing body or any affiliated organisation for the purpose of insurance or for publishing results either for the event alone or combined with or compared to other events. Results may include (but not be limited to) name, any club affiliation, race times, age group and sex.”

Enquiries and complaints.

A request to delete or restrict circulation of some or all of the data kept about them, received by the Membership Secretary in writing or by email from the member will be complied with within 30 days, and the member will receive confirmation of this. **A deletion of all the data will, however, mean cessation of membership.**

If a member wants to know which data are kept about them, or their children, or to make a complaint about the data-keeping arrangements they should enquire of the Membership Secretary or the Chair. The club will reply within 30 days.

If you are dissatisfied with how your concern or complaint is dealt with by the club, you have the right to report your concern or complaint to the Information Commissioners Office (www.ico.org.uk)

Data breach Notificaton

In the event of a data breach, action shall be taken to minimise the harm by ensuring all committee members are aware of the breach. Appropriate steps should be taken as soon as possible to rectify the problem. The committee shall also contact relevant Club members to inform them of the problem.

Online event entries

If you enter an event using an entry form on our website, you will need to make payment for your entry. In order to process your payment we use Stripe, a third party payment processor. Your payment will be processed by Stripe, who collect, use and process your information, including payment information, in accordance with their privacy policies. This process includes using essential cookies to provide this service. You can access their privacy policy via the following link: <https://stripe.com/gb/privacy>.

Date adopted: June 2018 and reviewed in June 2023

Date for further review: June 2028

Data Retention Periods

<p>Emails</p>	<p>12 months, if important retain for up to 6 years.</p>	<p>Not all emails need to be retained. If the content is deemed to be important and or relevant to a legitimate purpose, it may be kept for up to 6 years.</p>
<p>Club Journals</p>	<p>Potential to retain indefinitely subject to appropriate safeguards being in place.</p>	<p>Club Journals may be considered material with historical or statistical value and therefore retained under the exemptions afforded to:</p> <ul style="list-style-type: none"> • archiving purposes in the public interest • statistical purposes.
<p>Minutes of club meetings</p>	<p>Potential to retain indefinitely subject to appropriate safeguards being in place.</p>	<p>Minutes of club meetings may be considered material with historical or statistical value and therefore retained under the exemptions afforded to:</p>

		<ul style="list-style-type: none"> • archiving purposes in the public interest; • scientific research purposes; • or statistical purposes.
Accident reports – if relating to adults	Statutory requirement is 3 years after the last entry in the Accident book. To standardise with other records and for insurance purposes you may wish to retain for 6 years	These reports may be required as evidence if a claim is made on the British Orienteering insurance and should also be reported via the Incident reporting system.
Accident reports – if relating to children	To be kept for a minimum of 3 years after the child reaches the age of 18. As above, standardise with other records and for insurance purposes you may wish to retain for 6 years.	

Employee personnel records	6 years after the individual leaves employment with the club	Including attendance records, application forms, job or status change records, performance evaluations, termination papers, withholding information, garnishments, test results, training and qualification records
Safeguarding		The Information gathered during the course of an investigation will be retained by British Orienteering. Data relating to children will be kept for at least 25 years. Where the concern relates to an adult's behaviour around children, the file will be kept securely until the adult reaches 65 or for 10 years whichever is longer in accordance with NSPCC guidelines on records retention and storage.