

## **CORNWALL HOCKEY UMPIRES ASSOCIATION**

### **CHUA Lawful basis for Processing Personal Data**

Processing data is defined as:

*'Any operation or set of operations which is performed upon personal data or sets of personal data, such as collection, recording, organisation, structuring, storage, adaption, alteration, retrieval, consultation, use, disclosure by transmission, dissemination, or otherwise making available, restriction, deletion or destruction.'*

To comply with GDPR the CHUA will meet six privacy principles:

1. Personal data will be processed lawfully, fairly and in a transparent manner;
2. Personal data will only be collected for 'specified, explicit and legitimate purposes'.
3. Data collected must be adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.
4. Personal data must be accurate and where necessary kept up to date.
5. Personal data that is no longer required should be deleted.
6. Processors should ensure all personal data they hold is secure.

A summary of two of the lawful basis which are most likely to be relevant are '**Consent**' and '**Legitimate Interest**' both of which are detailed below.

#### **Consent**

The CHUA will keep records of an 'opt in form' which will state the specific use and purpose for which the information will be used.

There will also be an option for members to opt out and revoke (withdraw) their consent at any time they wish.

Purpose: Data will only be used for the purposes for which the member has given consent.

Once consent has been removed then members can no longer be contacted thus for example once a member has expressed a desire to unsubscribe from emails then no further e-mails can be sent to them.

#### **Legitimate Interest**

See the attached Record of Legitimate Interest for CHUA

The CHUA will also process data in the following manner: -

- a. The 'right to be forgotten' means that members can request for their data to be deleted. · Members have the right of access to the personal data held about them, via a 'Subject Access Request', thus there is no intention to give members the right to transfer their data 'Data portability'.
- b. CHUA will not provide data to third parties (such as storing data on an external 'cloud' storage system)
- c. There will be no storage of Sensitive Data (Special Categories of Personal Data) such as religious or political belief, ethnicity and health information.

### **Processing Personal Data about U18's**

For young people, over 13 but under 18 years old, consent can be gained from the individual themselves. There will be no requirement to hold data on anyone under 13.

Nor will there be any requirement to hold Emergency Contact Details on any members.

All club officers and volunteers involved in data handling will be aware of their responsibilities by clear policies, a culture of accountability and regular training and updates.