

## **Clumber Spaniel Club GDPR Privacy Policy**

The Clumber Spaniel Club is committed to protecting your personal information and respecting your privacy. To comply with General Data Protection Regulation (GDPR), we must tell you what personal data we hold about you, why we hold it and how it will be used. We must also have your permission to retain your personal details and undertake to delete them if requested by you

For the purpose of the General Data Protection Regulation [the GDPR], the data controller is the Clumber Spaniel Club (hereafter called the CSC). We may update this Privacy Notice from time to time. Please check back regularly to see any updates or changes to this Notice.

### **CSC Data Protection Principles**

Any data we hold will be used only for purposes directly related to the activities and effective administrative running of the CSC and will not be provided to any other person, organisation or business for any other purposes, except where required by law. The CSC will comply with data protection law. Any personal information we hold about you will be

1. Used lawfully, fairly and in a transparent way;
2. Collected only for valid purposes (as explained below) and not used in any way that is incompatible with those purposes;
3. Relevant to the purposes we have explained and limited only to those purposes;
4. Accurate and kept up to date;
5. Kept securely;
6. Kept only for as long as necessary, for the purposes we have told you about, and in accordance with our data retention policy (see below).

### **Your rights as a data subject**

The General Data Protection Regulation provides the following rights:

1. The right to request access to the personal data that we hold about you;
2. The right to request rectification of the personal data that we hold about you;
3. The right to request erasure of the personal data that we hold about you;
4. The right to request restriction of processing about you;
5. The right to object to processing; and
6. The right to data portability.

### **Personal Data Held by the CSC**

We process personal data about members, judges, stewards and exhibitors/competitors to our events. For the efficient running of the CSC we need to keep a record of:

1. Your name;
2. Your address;
3. Your home and/or mobile telephone number(s);
4. Your email address;
5. Your CSC membership category: (UK Single/ UK Joint/ Overseas/Junior/ Gamekeeper.
6. Your current or most recent year of CSC membership;
7. If you have an annual standing order for membership payments (we do not keep details of your bank account).

**Note** You are not obliged to provide the personal data in question. However, if you do not provide the personal data, we will be unable to perform any contract we have with you for the provision of membership services, judging appointments or event services

### **CSC Use of Personal Data**

The CSC will generally process your personal data in providing membership services and organising events. We may also use personal information for additional relevant and related purposes where you might reasonably expect us to do so, where this is not outweighed by your own interests, fundamental rights or freedoms. This may include:

1. Maintaining our records and other administrative purposes, including updating your details and preferences;
2. Contacting you with relevant information (e.g. newsletters and show schedules) by mail, telephone or email;
3. Publication of your personal data in a Membership List;
4. Publication of your personal data and dog information in CSC show/event catalogues;
5. Publication of show/event results on the CSC website, Facebook page or other CSC publications;
6. Administration and communications relating to judging lists and CSC judging appointments;
7. Communications related to membership and invitations to participate in canine market research or canine health studies;
8. Assistance with upholding our Club objectives and taking action in cases where there may be a breach of the CSC Rules or Codes of Ethics.
9. Assistance in ensuring compliance with Kennel Club Rules and Regulations;
10. Assistance with queries, complaints and dispute resolution.

You may request to see all the personal data we hold on you (we are allowed 30 days to provide it). We only keep your data for the reasons outlined above. We undertake to delete your personal data, or withhold it from publication, if you request us to do so in writing.

### **CSC Disclosure of Personal Data to Other Third Parties**

The CSC may use service providers to help us provide you with our services. Personal data may be transferred to such service providers, who act for or on our behalf, for further processing in accordance with the purpose(s) for which the data was originally collected or may otherwise be lawfully processed. This may include:

- Production of the CSC Yearbook;
- Production of CSC show/event catalogues;
- Other CSC publications.

In addition, we disclose data to the following outsourced data processors:

Kennel Club records

The Kennel Club will hold the personal data of officers of the Club/Society as a part of the implementation of Kennel Club Rules and Regulations.

We provide the Kennel Club with details of the CSC Officers and Challenge Certificate winners at our events in order to meet requirements in the Kennel Club Rules and Regulations.

Such third parties have contracted with us as data processors under the requirements in the GDPR. They are contractually bound to only use personal data for the agreed purpose(s). Relevant persons

working for these third parties will have access to your personal data under the terms of the data processor contract, but only to the extent necessary to perform their services for us.

### **CSC Data Retention Policy**

The CSC will only retain personal data for as long as necessary to fulfil the purposes for which it was collected, including for the purposes of satisfying any legal, accounting, or reporting requirements. Personal data may be further processed and stored for archiving in the interests of statistical and historical purposes. When doing so, we will consider the initial purpose, and the context for which the data was collected, the reasonable expectations of members, the nature of the data, the consequences of further processing and ensure that any further use of that data both complies with the GDPR, and that any such access occurs only under the existence of appropriate safeguards.

Old membership lists and other electronically held data may have some historical value and/or statistical value. The CSC will consider how long is practically useful.

### **Personal Data Breach**

A personal data breach can be broadly defined as a security incident that has affected the confidentiality, integrity or availability of personal data. There will be a personal data breach whenever any personal data is accidentally lost, destroyed, corrupted or disclosed; if someone accesses the data or passes it on without proper authorisation; or if the data is made unavailable and this unavailability has a significant negative effect on individuals.

The CSC will annually appoint a Data Protection Officer who will have responsibility for the following:

1. Monitoring that all GDPR policies as detailed above are adhered to.
2. Identification of any GDPR breach and reporting it to the CSC Committee and to the Information Commissioner's Office if found to be a reportable breach.
3. Notifying affected individuals about a breach when their rights and freedoms are at high risk.
4. Documenting all breaches, even if they don't all need to be reported.

### **Data Protection Contact**

Please contact the CSC Secretary if you have any questions or concerns about personal data and privacy matters. Contact details can be found on the CSC website: [www.clumberspanielclub.co.uk](http://www.clumberspanielclub.co.uk)