

<b>SECTION</b>	HR
<b>POLICY</b>	GDPR
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## 1. Introduction

The purpose and activities of Club Doncaster, as an organisation, means that we will need to collect and use information about groups that may come into contact with the group. This may include, but not be limited to, customers, suppliers, workers, students, volunteers and participants.

Club Doncaster organisations are defined as Doncaster Rovers Football Club, Doncaster Rugby League Football Club, Doncaster Rovers Belles Football Club, Club Doncaster Foundation and Doncaster CIC.

The information that we collate, store and destroy is governed under the General Data Protection Regulation (GDPR) guidelines 2016. We take our duties seriously and respect the trust that is given to us to ensure that the information is used appropriately and responsibly to benefit all parties.

Club Doncaster abides to the principles of GDPR and support the responsible use of data and its storage. We will ensure we have a legal reasoning for this data to be stored, are clear on what we use it for, and promote your right to be forgotten within all of our systems.

All workers, staff and volunteers are responsible for the delivery of this policy and its implementation to protect the data they come into contact with on a daily basis.

We ensure that persons associated with Club Doncaster are aware of their responsibilities, through induction, we undertake both verbal orientation in respect of duties and responsibilities and introduction to the named Data Protection Officer, who is currently Club Doncaster's Finance Director. Our principles are written within the Employee handbook, and within all Service Level Agreements entered into with third parties.

Where there are significant law changes and changes to the policy, face-to-face workshops will be undertaken to highlight policy changes and refresh good practice.

Club Doncaster defines personal data as both facts and opinions about an individual and where the information stored can identify an individual. For example, it may include a person's name, age, and address, date of birth, bank details, or transactions exchanged within Club Doncaster.

## **2. Latest Government guidance**

Club Doncaster will ensure its practice, this and other policies will follow the Government's seven golden rules for information sharing. This is relevant and appropriate to other Club Doncaster policies, such as Safeguarding.

The latest version of guidance can be accessed through the following link –

<https://www.gov.uk/data-protection>

## **3. Principles**

Club Doncaster will reasonably comply with the principles detailed below:

- To only use and store data when consent is explicitly given, and will not use assumed consent;
- Enable all persons to view and access their own data we keep, and where it is processed and used;
- To correct any identified errors as soon as this is practically possible;
- To be clear about when and how data is processed and used;
- To remove and 'forget' data when requested.

For the purposes of data storage, we will store details of all persons that may come into contact with our services, primarily through written consent, but in some transactions, this may be formal verbal consent. We will ensure that we are able to evidence we have taken appropriate steps to ensure that a person under the age of 18 has the permission of their parent/legal guardian to enter into information sharing, and deem it best practice and preference to communicate with parents directly and not minors.

When requiring information as a part of our service to you, Club Doncaster will ask your permission to share information internally within specific departments for the purposes of marketing emails. Should the product or information require us to liaise with external agencies, we will name this person as a party to the data and seek your permission to do this. We understand that this is your choice as to how we share your information, and you may contact us at any time to withdraw your consent. We may require to pass on your personal data to third party partners, who provide a service on our behalf. This is for the sole purpose of completing tasks and providing a service to you, and this is made clear in all Service Level Agreements that we have with companies.

## **4. Banking**

When Club Doncaster receives or transmits payments through electronic means (i.e. card or bank transactions) these will be submitted throughout our online banking system and payment systems.

## **5. In the event of a data leak**

Should your data be at risk from the loss or external security threat, we will notify you in any situation that may expose you to serious risk. In order to minimise the risk, we will take appropriate security measures against the information we have stored. This includes Cloud-based password systems and shared networks, not personal computer spaces, and ensuring that data will only be accessed to appropriately authorise persons via passwords and role examinations.

## **6. Data storage**

We will hold your data on our systems for as long as we have a customer/supplier agreement in place with you and communication/transaction remains live. Following the end of any communication or transaction, we will continue to hold any information for a maximum of three years before securely deleting/destroying the information we hold.

## **7. Commitment**

We will review our policies and the reasoning for keeping your personal data annually and establish whether we are still entitled to process it. If we decide that we are not entitled to do so, we will archive your data securely and destroy after three years, or the relationship is re-introduced.

If the information we hold is in relation to a legal or safeguarding matter, we will hold this information as long as is necessary to comply with our legal obligations.

Club Doncaster will hold information on staff files for up to six years after the employment with the Company has come to an end. Club Doncaster reserves the right to hold this information for longer if it has legitimate reasons to do so.

All persons have the right to access their information held by Club Doncaster. Any data held on them can be requested in writing to the data controller who will respond within 28 days upon receipt of any request. Please note that certain data is exempted from any release, which may hinder any past, present or future, criminal, statutory or legal investigation.

All persons have the right to correct any information, which they believe to be inaccurate. Data subjects must notify the data controller of any changes or additional notes they wish to add to their data, which will ensure this is added to any records that are still live within 28 days.

For any Employee wishing to update their payroll information, they must first go through HR who will check the authenticity of the request, before sanctioning with payroll.

All persons have the right to be forgotten and have their data removed from Club Doncaster systems. All data can be requested to be 'forgotten'. To request this, you must write to the data controller, who will ensure that data is removed from all appropriate systems. Please note that certain data is exempt from any release, which may hinder any past, present or future, criminal, statutory or legal investigation.

In the majority of cases, where information is not stored for the purposes of Safeguarding or legal reasons, we will actively seek consent to store and keep information (detailed in Appendix A).

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## **8. Contact information**

Further information in relation to GDPR can be found at the website for the Information Commissioner - <https://ico.org.uk/>

The Information Commissioners Office  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF

Our named Data Protection Controller is Matt Evans, Finance Director. He can be contacted through [matt.evans@clubdoncaster.co.uk](mailto:matt.evans@clubdoncaster.co.uk).

Eco-Power Stadium  
Stadium Way  
Doncaster  
DN4 5JW

The Data Protection Controller will endeavour to ensure that personal data stored within Club Doncaster activity is processed in compliance with this policy. Any questions about the operation of this policy and concerns that the policy is not being followed should it be referred in the first instance of the Data Protection Controller or reported in line with Club Doncaster's grievance and whistleblowing policies.

We have implemented, in partnership with Jibba Jabba, acceptable security settings to protect the loss, misuse and destruction of your data from electronic storage. We do not however accept liability when the data transferred over to use within the internet is 100% secure.

## 9. Appendix A

Type of information	Purpose	Legal basis of processing
Customers Name, Address, telephone number, email address, date of birth.	To purchase match and season memberships.  Initial comments, complaints, customer queries.	Performing Club Doncaster's contract with the member, and legitimate interests in operating Club Doncaster.
Business-to-business, contact name, telephone number, address, email address	To purchase pre-agreed corporate packages and sponsorship opportunities.	Performing Club Doncaster's contract with the member, and legitimate interests in operating Club Doncaster.
Parental consent for customers under the age of 18, children's name, address, telephone number, email address, date of birth.	To purchase match and season memberships.  To join Junior Rovers/Red Squad activities.  To participate in matchday Experiences.  To become a mascot during matchday.  To register as a Player associated with Doncaster Rovers.  To register as a Player with Doncaster Rugby League Football Club.  To register as a Player with Doncaster Rovers Belles Football Club.  To participate in Club Doncaster Foundation and Doncaster CIC activities.	Performing Club Doncaster's contract with the parent/ guardian on behalf
Emergency Contact Details	Contacting next of kin in an emergency.	Protecting vital interests in respect of the person.
Staff/Volunteers Name, Address, telephone number, email address, date of birth	To manage the staff work force, and ensure that two way communication can be delivered.	Performing Club Doncaster's contract with the member, and legitimate interests in operating Club Doncaster.
Photos and videos of customers at Club Doncaster Activity	Putting on the Club Doncaster website, used for marketing purposes.	For specific project and pictures of minors we will seek consent via an appropriate activity based consent form.
Photos and Videos of workers/ volunteers on Club Doncaster activity.	ID card purposes, identification purposes, marketing purposes.	Consent will be sought within all working agreements between parties.

Customer Bank Account /Payment Details	Managing the member's payment for services rendered.	Performing Club Doncaster contract.
Staff Bank Account/ Payment Details.	Managing the payment of contracts via PAYE.	Performing Club Doncaster contract.
Supplier Bank Account/ Payment Details	Managing the payment of services as per Service Level Agreements.	Performing Club Doncaster contract.
CCTV moving and still imaging	Managing the security of the building and any person connected with Club Doncaster.	The safety of the building and legal obligations when required.