

## British Dodgeball Privacy Policy

This privacy notice outlines how your data is used by British Dodgeball.

### Core Beliefs

British Dodgeball's core beliefs regarding user privacy and data protection:

- User privacy and data protection are of the utmost importance, personal data is exactly that; personal
- We have a duty of care to the people within our data
- Data is collected and processed only when absolutely necessary
- We use data to give you the best possible experience with our services
- We will never sell, rent or otherwise distribute or make public your personal information

### Club Information

British Dodgeball is recognised as the leading dodgeball organisation in Great Britain and Northern Ireland (the UK) by the World Dodgeball Association and the European Dodgeball Federation. We offer support and services to the national teams, clubs, players, coaches and officials

### Data Protection Information

The following Privacy Information is being provided to you as outlined in the General Data Protection Regulation. It is intended to inform you of how the personal information provided on this form will be used, by whom and for what purposes.

### Data Controller:

Ben Hoyle & John Slemensek. Email [hello@britishdodgeball.com](mailto:hello@britishdodgeball.com)

### Purpose of processing Personal Information:

The purpose for processing your personal data is that it is necessary for the performance of a contract in order to register and maintain your entry into our event. Personal data will be used for administrative purposes to maintain registrations, team sheets, referee reports, disciplinary matters, injury reports, transfers, sanctions, permits and for statistical purposes.

### Photography and Videography

British Dodgeball look to promote the sport for the benefit of the overall growth and development of dodgeball throughout the UK. Throughout the season British Dodgeball collects visual content for use on social media, website, newsletter, digital and print outlets. In using British Dodgeball's services, including participating in events, you agree to use of these images by British Dodgeball as long as seen relevant. British Dodgeball will always act with respect to your image and will not use it without legitimate purpose. If you wish to not be feature in British Dodgeball's visual content, please inform John Slemensek, Director of Marketing: [john@britishdodgeball.com](mailto:john@britishdodgeball.com)

### Data Processors:

Your personal data can be accessed only by certain members of the British Dodgeball staff, and relevant volunteers and contractors, and will be done in accordance with our data protection policy only.

**Storage of Personal Information:**

Your data will be stored on the British Dodgeball internal database and approved and protected software including Google Mail services, Wordpress, and Mailchimp, as well as on private hardware including staff computers and mobile phones where relevant.

**Length of Data Storage:**

Your personal data will be held for the duration of your membership and it will be deleted by us within 6 months of you resigning your membership/involvement with any of our services.

**Subject Access Request:**

You have the right to request a copy of your personal data held by the club by contacting the Data Controller. You should receive this information within 30 days.

**Personal Data Rights:**

You have the right to have your Personal Data updated, rectified, or deleted if you so wish. You have the right to object to your Personal Data being processed and to withdraw your consent to processing - You can do so by contacting us.

**Member and Affiliate Actions:**

British Dodgeball expect all members to agree and adhere to our Privacy and Data Protection Policies, however, the functioning and administration of any club/ affiliated member is with their own autonomy, and British Dodgeball is not responsible for any result from lack of compliance/ procedure from any of our affiliated clubs/ members' management of their own data.

**Complaints:**

Should you wish to make a complaint or report a breach in relation to your personal data, you can do so by contacting the Information Commissioner's Office - <https://ico.org.uk/global/contact-us/>.

**Refusal to disclose personal data:**

If you do not provide personal data, then your entry cannot be registered with British Dodgeball.

**Data Protection Officers**

British Dodgeball has two data protection officers:

Ben Hoyle - Director of Development, British Dodgeball - [ben@britishdodgeball.com](mailto:ben@britishdodgeball.com)

John Slemensek - Director of Marketing, British Dodgeball - [john@britishdodgeball.com](mailto:john@britishdodgeball.com)

**Changes to this Privacy Policy**

This privacy policy may change from time to time inline with legislation or industry developments. British Dodgeball will not explicitly inform clients or website users of these changes. Instead, it is recommend that you check this page occasionally for any policy changes.

## The British Dodgeball Data Protection Policy

### Data Protection

British Dodgeball takes its responsibilities with regard to the management of the requirements of the Data Protection Act 1998 very seriously. This document provides the policy framework through which effective management of Data Protection matters can be achieved.

### 1. Scope of the Policy

The purpose of this policy is to ensure that the British Dodgeball and British Dodgeball's staff, volunteers, and members comply with the provisions of the Data Protection Act 1998 when processing personal data. Any infringement of the Act will be treated seriously by British Dodgeball and may be considered under disciplinary procedures. British Dodgeball expects all of its staff, volunteers and members to act with ethical integrity and respect of all who interact on any level with our sport.

This policy applies regardless of where the data is held, for example if it is held on personally-owned equipment, or property of British Dodgeball.

British Dodgeball adhere's to the eight principles of data protection as laid down by the Data Protection Act 1998. In accordance with those principles personal data shall be:

- Processed fairly and lawfully
- Processed for specified purposes only
- Adequate, relevant and not excessive
- Accurate and up to date
- Not kept longer than necessary
- Processed in accordance with data subjects' rights
- Processed and held securely
- Not transferred outside the countries of the European Economic Area without adequate protection.

### 2. Responsibilities

#### [i] British Dodgeball Responsibilities

As the Data Controller the British Dodgeball is responsible for establishing policies and procedures in order to comply with the requirements of the Data Protection Act 1998.

#### [ii] Governance Team Responsibilities

**Governance Team - Ben Hoyle, John Slemensek**  
Contact [hello@britishdodgeball.com](mailto:hello@britishdodgeball.com)

#### The Governance Team holds responsibility for:

- Drawing up guidance, giving advice and promoting compliance with this policy in such a way as to ensure the easy, appropriate and timely retrieval of information;
- The appropriate compliance with subject access rights and ensuring that data is released in accordance with subject access legislation under the Data Protection Act 1998;
- Ensuring that any data protection breaches are resolved, catalogued and reported appropriately in a swift manner and in line with guidance from the Information Commissioner's Office;
- Investigating and responding to complaints regarding data protection including requests to cease processing personal data.

### **[iii] Staff Responsibilities**

Staff members who process personal data about members, staff, volunteers, spectators, affiliates or any other individual must comply with the requirements of this policy.

Staff members must ensure that:

- all personal data is kept securely;
- no personal data is disclosed either verbally or in writing, accidentally or otherwise, to any unauthorised third party;
- personal data is kept in accordance with British Dodgeball's outlined timescales;
- any queries regarding data protection, including subject access requests and complaints, are promptly directed to the Governance Team;
- any data protection breaches are swiftly brought to the attention of the Governance Team and that they support the Governance Team in resolving breaches;
- where there is uncertainty around a Data Protection matter advice is sought from the Governance Team.
- Staff who are unsure about who are the authorised third parties to whom they can legitimately disclose personal data should seek advice from the Governance Team.

### **[iv] Third-Party Data Processors**

British Dodgeball uses third-party companies and services in the format of digital services such as social media, web management and email services.

Where a third-party data processor is used:

- A data processor must be chosen which provides sufficient guarantees about its security measures to protect the processing of personal data;
- Reasonable steps must be taken that such security measures are in place;
- Protection of passwords and access to such services will be securely maintained by the Governance Team and only released where relevant and with correct procedure.

For further guidance about the use of third-party data processors please contact the Governance Team.

Our data processors include:

Google ([Privacy policy](#))  
Mailchimp ([Privacy Policy](#))  
Wordpress ([Privacy Policy](#))

### **[v] Contractors, Short-Term and Voluntary Staff**

British Dodgeball is an expanding network of people very passionate about the sport of dodgeball. British Dodgeball is responsible for the use made of personal data by anyone working on its behalf. Contractors, short-term or voluntary staff are appropriately vetted for the data they will be processing.

British Dodgeball will ensure that any contractors, short-term, or voluntary staff should ensure that:

- any personal data collected or processed in the course of work undertaken for British Dodgeball is kept securely and confidentially;
- all personal data is returned or given to British Dodgeball on completion of the work, including any copies that may have been made. Alternatively that the data is securely destroyed and British Dodgeball receives notification in this regard from the contractor or short-term/ voluntary member of staff;
- British Dodgeball receives prior notification of any disclosure of personal data to any other organisation or any person who is not a direct employee of the contractor;
- all practical and reasonable steps are taken to ensure that contractors, short-term or voluntary staff do not have access to any personal data beyond what is essential for the work to be carried out properly.

**[vi] Member Responsibilities**

Members, as individuals and affiliated clubs, are responsible for:

- familiarising themselves with the Data Protection Agreement and Policy, as well as Privacy Policy, provided with their membership to British Dodgeball;
- ensuring they adhere to the necessary rules, regulations and guidance within this Data Protection Policy;
- Contacting the British Dodgeball Governance team should any question or issue arise with their collating of personal data

**3. Subject Access Requests**

The British Dodgeball is required to permit individuals to access their own personal data held by British Dodgeball via a subject access request. Any individual wishing to exercise this right should do so in writing to the Governance Team and a charge may be made for this request.

British Dodgeball aims to comply with requests for access to personal information as quickly as possible, but will ensure that it is provided within the 40 calendar day limit set out in the Data Protection Act 1998.

Individuals will not be entitled to access information to which any of the exemptions in the Act applies. However, only those specific pieces of information to which the exemption applies will be withheld and determining the application of exemptions will be made by the Governance Team. British Dodgeball currently charges £10 to make a subject access request, unless presented with a suitable reason for exemption.

**4. Data Protection breaches**

Where a Data Protection breach occurs, or is suspected, it should be reported immediately in accordance with the Data Security Breach Incident Management Policy which states: Confirmed or suspected data security breaches should be reported promptly to the British Dodgeball Governance Team on email: [hello@britishdodgeball.com](mailto:hello@britishdodgeball.com). The report should include full and accurate details of the incident including who is reporting the incident and what classification of data is involved.

**5. Contact**

Queries regarding this policy or the Data Protection Act at large should be directed to the Governance Team at [hello@britishdodgeball.com](mailto:hello@britishdodgeball.com)



## Data Security Brach Incident Management Policy

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### 1. Background

Data security breaches are increasingly common occurrences whether these are caused through human error or via malicious intent. As technology trends change and the creation of data and information grows, there are more emerging ways by which data can be breached.

British Dodgeball needs to have in place a robust and systematic process for responding to any reported data security breach, to ensure it can act responsibly and protect its information assets as far as possible.

### 2. Aim

The aim of this policy is to create a clear and manageable response to any reported data breach incident, and ensure that they are appropriately logged and dealt with in accordance with best practice guidelines.

In its approach British Dodgeball aims that:

- incidents are reported in a timely manner and can be properly investigated
- incidents are handled by appropriately authorised and skilled personnel
- appropriate levels of British Dodgeball management are involved in response management
- incidents are recorded and documented
- the impact of the incidents are understood and action is taken to prevent further damage
- evidence is gathered, recorded and maintained in a form that will withstand internal and external scrutiny
- external bodies or data subjects are informed as required
- the incidents are dealt with in a timely manner and normal operations restored
- the incidents are reviewed to identify improvements in policies and procedures.

### 3. Definition

A data security breach is considered to be “any loss of, or unauthorised access to data”. Examples of data security breaches may include:

- Loss or theft of data or equipment on which data is stored
- Unauthorised access to confidential or highly confidential data
- Equipment failure
- Software failure
- Human error
- Unforeseen circumstances such as a fire or flood
- Hacking attack
- ‘Blagging’ offences where information is obtained by deceit

#### **4. Scope**

This policy applies to all British Dodgeball information, regardless of format, and is applicable to all staff, members, visitors, contractors and data processors acting on behalf of the British Dodgeball.

It is to be read in conjunction with the British Dodgeball Data Protection Policy and Privacy Policy.

#### **5. Responsibilities**

##### **5.a Information Users**

All information users are responsible for reporting actual, suspected, threatened or potential information security incidents and for assisting with investigations as required, particularly if urgent action must be taken to prevent further damage.

##### **5.b British Dodgeball Governance Team**

The British Dodgeball Governance team are responsible for ensuring that staff and relevant volunteers act in compliance with this policy and assist with investigations as required.

##### **5.c British Dodgeball Governance Team Response Management**

The British Dodgeball Governance Team will be responsible for overseeing management of the breach.

##### **5.d Contact Details**

The British Dodgeball Governance Team consists of Ben Hoyle and John Slemensek who can be contacted on [hello@britishdodgeball.com](mailto:hello@britishdodgeball.com)

#### **6. Data Classification**

Data security breaches will vary in impact and risk depending on the content and the quantity of the data involved, therefore it is important that British Dodgeball is able to quickly identify the classification of the data and respond to all reported incidents in a timely and thorough manner.

All reported incidents will need to include the appropriate data classification in order for assessment of risk to be conducted. Data classification referred to in this policy means the following categories:

##### **6.a Public Data:**

Information intended for public use, or information which can be made public without any negative impact for British Dodgeball or its members.

##### **6.b Internal Data:**

Information regarding the day-to-day business operations of British Dodgeball. Primarily for staff and member use.

##### **6.c Confidential Data:**

Information of a more sensitive nature for the business. Access should be limited to only those people that need to know as part of their role within British Dodgeball.

##### **6.d Highly Confidential Data:**

Information that, if released, will cause significant damage to British Dodgeball's business activities or reputation, or would lead to breach of the Data Protection Act 1998. Access to this information should be highly restricted.

#### **7. Data Security Breach Reporting**

Confirmed or suspected data security breaches should be reported promptly to the British Dodgeball Governance Team which consists of Ben Hoyle and John Slemensek who can be contacted on [hello@britishdodgeball.com](mailto:hello@britishdodgeball.com).

The report should include full and accurate details of the incident including who is reporting the incident and what classification of data is involved. Where possible the incident report form should be completed as part of the reporting process. See Appendix 1.

Once a data breach has been reported an initial assessment will be made to establish the severity of the breach. See Appendix 2.

All data security breaches will be centrally logged through the British Dodgeball Governance Team to ensure appropriate oversight in the types and frequency of confirmed incidents for management and reporting purposes.

#### **8. Data Breach Management Plan**

The management response to any reported data security breach will involve the following four elements.

See Appendix 2 for suggested checklist.

##### **A. Containment and Recovery**

##### **B. Assessment of Risks**

##### **C. Consideration of Further Notification**

##### **D. Evaluation and Response**

Each of these four elements will need to be conducted in accordance with the checklist for any data security breaches. An activity log recording the timeline of the incident management should also be completed.

See Appendix 2.

#### **9. Authority**

Staff, members, volunteers, contractors, spectators and guests who act in breach of this policy, or who do not act to implement it, may be subject to disciplinary procedures or other appropriate sanctions.

#### **10. Member and Affiliate Conduct**

Although all British Dodgeball members will be expected to agree and adhere to our Data Protection Policy, including contractual agreement with use of services, however, the functioning and administration of any club/ affiliated member is with their own autonomy, and British Dodgeball is not responsible for any result from lack of compliance/ procedure from any of our affiliated clubs/ members management of their own data.

Any members and affiliates wishing to seek support on adhering to British Dodgeball's policies, and meeting their own compliance and correct procedures, are invited to contact the British Dodgeball Governance Team.

#### **11. Review**

The British Dodgeball Governance Team will monitor the effectiveness of this policy and carry out regular reviews of all reported breaches.

#### **12. References:**

Information Commissioner:

[https://ico.org.uk/media/1562/guidance\\_on\\_data\\_security\\_breach\\_management.pdf](https://ico.org.uk/media/1562/guidance_on_data_security_breach_management.pdf)