

Data Privacy Notice

Summary of how we and the RFU use your data

- The Middlesex County Rugby Football Union Ltd (MCRFU) uses your personal data to manage and administer your membership and your involvement with its members and member clubs, and to keep in contact with you for these purposes.
- Some data is shared with the RFU, who use your data to regulate, develop and manage the game.
- Where we or the RFU rely on your consent you can withdraw this consent at any time.

Purpose of the policy

MCRFU is committed to protecting and respecting your privacy. For any personal data you provide for the purposes of your membership or volunteering, MCRFU is the Data Controller and is responsible for storing and otherwise processing that data in a fair, lawful, secure and transparent way.

This policy describes how the MCRFU (also referred to as “the county”, “we” or “us”) will make use of the data we handle in relation to our members, including our use GMS provided by the Rugby Football Union (“RFU”).

It also describes your data protection rights, including a right to object to some of the processing which we carry out. More information about your rights, and how to exercise them, is set out in the “What rights do I have?” section.

What information do we collect?

We collect and process personal data from you (or your parent) when you join and when we carry out annual renewals of your membership. This includes:

- your name
- your gender,
- your date of birth,
- your home address, email address and phone number;
- your type of membership and involvement in a particular club, or any key role you may have been allocated, such as referee, coach or observer, and for member clubs, Membership Secretary, etc.;
- your payment and/or bank account details, where you provide these to claim expenses or pay membership fees;

Some information will be generated as part of your involvement with us, in particular data about fixtures and your appointments to games and match reports.

What information do we receive from third parties?

Sometimes, we receive information about you from third parties; for example, if you are under 18 years of age, we may be given information about you by your parents.

We may also receive information relating to your existing registrations with other clubs, the RFU or rugby bodies.

How do we use this information, and what is the legal basis for this use?

We process this personal data for the following purposes:

As required by the County to conduct our business and pursue our legitimate interests, in particular:

we will use your information to manage and administer your membership and your involvement with our member clubs, and to keep in contact with you for these purposes;

where you play representative rugby for the county, we will also use data to maintain records of your appearances for county teams, including match reports;

Where you give us consent:

on occasions where we ask you for consent, we will use the data for the purpose which we explain at that time.

For purposes which are required by law:

we maintain records (such as discipline records) in order to meet specific legal requirements;

we may respond to requests by government or law enforcement authorities conducting an investigation.

Withdrawing consent

Wherever we rely on your consent, you will always be able to withdraw that consent, although we may have other legal grounds for processing your data for other purposes, such as those set out above.

Who will we share this data with, where and when?

Some limited information may be shared with other stakeholders in rugby, such as the RFU, other clubs, constituent bodies, referee societies, league organisers, so that they can maintain appropriate records and assist us in organising matches and administering the game.

Personal data may be shared with government authorities and/or law enforcement officials if required by law or if required for the legal protection of our or the RFU's legitimate interests in compliance with applicable laws.

What rights do I have?

You have the right to ask us for a copy of your personal data; to correct, delete or restrict (stop any active) processing of your personal data; and to obtain the personal data you provide to us for a contract or with your consent in a structured, machine readable format.

In addition, you can object to the processing of your personal data in some circumstances (in particular, where we don't have to process the data to meet a contractual or other legal requirement).

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These rights may be limited, for example if fulfilling your request would reveal personal data about another person, or if you ask us to delete information which we are required by law to keep or have compelling legitimate interests in keeping.

You have the same rights for data held by the RFU for its own purposes on GMS.

To exercise any of these rights, you can get in touch with us – or, as appropriate, the RFU or its data protection officer – using the details set out below. If you have unresolved concerns, you have the right to complain to the Information Commissioner’s Office.

Whilst this privacy notice sets out a general summary of your legal rights in respect of personal information, this is a very complex area of law. More information about your legal rights can be found on the Information Commissioner’s website at <https://ico.org.uk/for-the-public/>.

How do I get in touch with MCRFU or the RFU?

We hope that we can satisfy queries you may have about the way we process your data. If you have any concerns about how we process your data, you can get in touch with us at countyoffice@middlesexrugby.com or by writing to Middlesex Rugby, PK1 Twyford Avenue Sports Ground, Twyford Avenue, Acton, London W3 9QA.

If you have any concerns about how the RFU process your data, you can get in touch at legal@rfu.com or by writing to The Data Protection Officer, Rugby Football Union, Twickenham Stadium, 200 Whitton Road, Twickenham TW2 7BA.

How long will you retain my data?

We process the majority of your data for as long as you are an active member and for 3 years after this.

Where we process personal data in connection with performing a contract, we keep the data for up to 6 years from your last interaction with us.

We will retain information held to maintain statutory records in line with appropriate statutory requirements or guidance.

The RFU will maintain records of individuals who have registered on GMS, records of DBS checks and the resulting outcomes and other disciplinary matters for such period as is set out in the RFU’s privacy notice to be set out on www.englandrugby.com.

Records of your involvement in a particular match, on results pages or in match reports may be held indefinitely both by us and the RFU in order to maintain a record of the game.

Owner of this Policy

This policy is owned by the MCRFU Secretary and approved by the Middlesex County RFU Management Board. This policy will be reviewed and updated annually.

Document Approval History

Date	Version	Document Approver	Comment
X	Version 2.0	X	Policy redrafted in June 2020
4th June 2020	1.1		Draft

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