

DATA PROTECTION PRIVACY NOTICE (GENERAL): SOCIAL/RECREATIONAL DATA PROCESSING

Introduction

1. This is the general statement of personal data processing relating to sports/social/recreational clubs and societies directly related to delivering services for military and civilian personnel working within Air Command, or the wider Royal Air Force ('RAF'). The aim of such clubs/societies is to provide sports/social/leisure services (including hobbies, personal development and local community support) and team ethos/wellbeing services (including fitness, force development, etc) for the RAF community.

2. This notice explains how the club/society named in the enclosed Data Protection Privacy Notice (Supporting), referred to as the 'Supporting Notice', handles and uses the personal data it collects for the proper conduct of its operations and activities. This 'General Notice' should be read in conjunction with the Supporting Notice, which provides the club/society's contact information along with other additional details.

Definitions

3. Within this notice and the enclosed Supporting Notice:

a. **'Personnel'** is defined as all military staff (Regulars and Reservists), Civil Servants and contractors working for the RAF.

b. **'Dependants'** is defined as close family members of personnel (spouses, partners, parents, children, etc).

c. **'Former personnel'** is defined as all retired military staff (Regulars and Reservists) and retired Civil Servants with a continuing social/recreational relationship with the RAF.

d. **'Clubs/societies'** are defined as those organisations associated with, but not part of, the public entity referred to as the MOD. They **do not** include:

(1) RAF-related Charities (such as the RAF Association, the RAF Benevolent Fund, the RAF Charitable Trust, the RAF Museum, the RAF Club, the RAF Central Fund and the RAF Sports Federation); these should be contacted directly for details of their privacy arrangements.

(2) Service-funded social/recreational activities delivered as part of the MOD's public tasks (such as Officers' Messes, etc), which are covered by the [MOD Privacy Notice](#), which is available online at gov.uk; search for 'MOD privacy notice'.

e. **'Club/society members'** are those personnel, dependants and former personnel who elect to join that club/society and enter into an obligation to pay any associated subscriptions and/or invoices related to the provision of the

social/recreational activity in question.

f. **'Data controllers'** are the persons/organisations who decide what purposes the data subject's personal data is needed and the means of processing it. The club/society is the Data Controller in this respect (or possibly Joint Data Controller, see Paragraph 17).

g. **'Contractors'** are any third party contracted to deliver a service to the members, on behalf of the club/society.

h. **'Delivery partners'** are third-party organisations which the club/society work with to deliver their objectives.

i. **'Consent'** means the process by which a person freely gives an informed and unambiguous affirmative indication that they agree to the club/society processing their personal data for a specific purpose. Individuals have control over whether they consent and can withdraw their consent at any time without affecting their rights.

j. **'Explicit consent'** means that the individual should expressly confirm their consent (as defined above), for example by a written statement, filling in an electronic form or sending an email.

k. **'Personal data'** means information relating to a person who can be identified or is identifiable directly by that information or indirectly in combination with other information. This includes, but is not limited to, the individual's name, identification number, location data etc.

l. **'Special category data'** means particularly sensitive pieces of information including, but not limited to, the individual's race, ethnic origin, health, biometrics, religious beliefs, political opinions etc. This sort of information needs a higher level of protection.

Purpose of processing

4. Clubs/societies will process members' personal data for the following purposes:

- a. Facilitating health, wellbeing and team development (welfare, sporting, social activities/events etc).
- b. Facilitating public relations and community engagement.
- c. Ensuring the safety and security of club/society members and others (including site access, passes, visits, Health and Safety, etc).
- d. Verifying that the potential member is entitled to join and remain a member of a club/society.
- e. Keeping financial records (e.g. the payment of membership fees).

f. To keep members' personal details up to date (e.g. their name, photograph, membership number and preferred contact details), including ensuring effective communications with them.

g. General administration of the service(s) the club/society provides.

5. The club/society will process personal data to meet the above functions. These normally include (but is not limited to) details relating to:

a. Member's contact/identification details and those of any guests who members wish to invite to partake in the clubs/society's activities.

b. Specific instructions regarding the delivery of that service to members and any guests the members invite to partake in the club's/society's activities (such as food preferences, collection points, etc).

c. Members' financial information (for the payment of membership fees, etc).

Lawfulness of processing

6. The legal bases upon which the club/society may process members' personal data are:

a. Where there is an agreement between members and the club/society that the club/society will provide a member with a service and the club/society needs to process members' data to fulfil that agreement.

b. Where it is necessary, as part of the legitimate interests of the club/society, to process data in order to carry out the management and delivery of services to its members.

c. Where it is necessary to process data to protect members, their dependents' or invited guests' vital interests (e.g. for emergency medical purposes).

d. Where the club/society would be in violation of its legal obligations under UK law if it did not process the data.

e. Where the club/society receives members' informed consent to marketing activities. Please note, a copy of the member's completed consent form will be retained for the associated retention period after processing has concluded (see Paragraph 10 for further details). This is required to allow the club/society to demonstrate that it has processed the member's data with their consent.

Special category data

7. If the club/society needs to process special category data, it will contact members directly with the specifics of the data it wishes to collect and its reasons for collecting it. This is most likely to involve potential health issues such as food allergies and any medical conditions which might preclude participation in the social/recreational activities of the club/society.

Members' rights

8. Members have the following rights, which they may exercise at any time:

a. **Right of access.** Members can request access to their personal data held by the club/society. The club/society will aim to deliver the requested data within one calendar month. If the member's request will take longer to respond to (e.g. because the request is particularly complex), the club/society will contact the member with information on progress and check if the member wants to be sent the information found so far. The club/society may refuse member's access for legitimate reasons, including:

- (1) To protect the privacy and rights of other people.
- (2) If the member already has or have been granted access to the data.

Subject to the above, the club/society will provide a copy of the information in a commonly accessible format. The club/society may exercise redaction on any information it provides to the member. If the club/society is not able to provide a copy, it reserves the right to invite the member to view the originals of the data. The decision to do this is subject to the discretion of the club/society. The club/society will not charge a fee to comply with member's request unless their request is manifestly unfounded or excessive.

b. **Right to rectification.** Members can ask the club/society to correct any inaccurate personal data it holds about them. The club/society will aim to act upon such requests within one calendar month. If the request will take longer to respond to (e.g. because the request is particularly complex), the club/society will contact the member with information on its progress. The club/society is not required to amend information it is satisfied is accurate. The club/society may refuse to comply with a member's request if it is manifestly unfounded or excessive. The club/society will not charge a fee to comply with a member's request unless it is manifestly unfounded or excessive.

c. **Right to restrict processing.** Members can ask the club/society to stop processing their data when they believe any of the following apply:

- (1) The data is inaccurate.
- (2) The club/society is unlawfully processing the data, but the member does not want the club/society to erase it.
- (3) The club/society no longer needs the data, but the member wants the data to be retained by the club/society for legal reasons (e.g. to defend a legal claim).
- (4) The club/society's legitimate interests in processing the data, and/or the club/society's view that the processing is in the public interest, do not outweigh the member's fundamental rights and freedoms.

Once such a request has been made the club/society will usually not process the member's data in any way except to store it. When and if the club/society has resolved the issue, it will inform the member before it recommences processing their data. The club/society can refuse to comply with the member's request if it is manifestly unfounded or excessive. The club/society will not charge a fee to comply with member's request unless the request is manifestly unfounded or excessive.

d. **Right to portability.** Members can request that any of their data the club/society has processed by automated means (i.e. by computer) be provided to them in a commonly used and machine-readable format or be transmitted to another data controller without hindrance. The right to portability only applies where the legal basis for the club/society processing the members' data was either:

- (1) The member's informed consent.
- (2) The club/society needed to process the data to carry out the terms of their agreement with the member.

e. **Right to withdraw consent.** Where the club/society is processing members' data on the legal basis of the member's consent, the member can withdraw consent at any time. If the member wishes to withdraw consent, he/she should contact the club/society's Nominated Contact Person, using the details in the enclosed Supporting Notice, and clearly state that he/she wishes to withdraw consent. The club/society will contact the member to confirm that it has complied with the member's wishes in relation to this request.

f. **Right to erasure (the 'right to be forgotten').** Members can ask the club/society to erase their data under the following circumstances:

- (1) The member no longer wishes to use or receive any services from the club/society, including ceasing to be a member. This would be subject to all outstanding bills being paid, loaned equipment returned in an acceptable condition and all other membership commitments being honoured.
- (2) The lawful basis the club/society was relying on to process the member's data was consent and that has been withdrawn.
- (3) The lawful basis the club/society was relying on to process members' data was its legitimate interests, and/or public interest, but it has been shown that its interests do not outweigh the members' rights and freedoms.
- (4) The processing of members' data has been proved to be unlawful.

g. **Right to human intervention.** Members can object to decisions based solely on automated processing (**'automated decision-making'**), including profiling, when they significantly affect them. Although automated processing might be legitimate (required for the performance of a contract, authorised under UK law or the member has given explicit consent), the member has the right to seek human intervention (an official of the club/society) in the processing, so they can express his or her point of view and, if appropriate, contest the decision.

9. If members ask the club/society to erase, rectify, or restrict the processing of their personal data, the club/society will inform any third parties it has shared their personal data with of that request (unless it would be impossible, or involve disproportionate effort, to do so). If members have asked the club/society to erase data, it will also make reasonable attempts to erase any data which might have entered the public domain via its processing.

Data retention and security

10. The club/society will retain members' data in line with the retention schedules published in Joint Service Publication 441. These schedules are available online at gov.uk; search for 'joint service publication 441'.

11. The club/society is committed to the security of data processing. Members' personal data will be securely retained, using appropriate technical and organisational measures. These include, but are not limited to:

- a. Computer and network security.
- b. Physical site security.

12. The club/society's security is conducted in line with MOD policy. The details of this policy are available online at gov.uk; search for 'joint service publication 441'.

Third parties

13. If required, and always in accordance with one of the above legal bases for processing members' personal data, the club/society may share data with the following categories of recipients:

- a. MOD personnel.
- b. Contractors (as part of a service or supplier arrangement).
- c. Delivery partners (including charities).
- d. Law enforcement agencies or other organisations to comply with a legal obligation.

International data transfers

14. The club/society may need to send members' personal data to a third country or international organisation outside the European Economic Area ('EEA') when providing its services (e.g. to book an international sports trip). Whenever the club/society transfers members' personal data outside of the EEA, it will seek to ensure similar protection of its members personal data to that which exists under UK law.

Who is accountable for data protection?

15. The club/society is the Data Controller (or possibly Joint Data Controller, see Paragraph 17). As a 'not-for-profit' organisation, the club/society is not required to be registered with the Information Commissioner's Office (ICO); however, the club/society is still

accountable to the ICO and subject to its scrutiny, as the UK's supervisory authority for data protection.

16. If members have any questions regarding the protection of their data, or wish to exercise any of their data rights, they should contact the club's/society's Nominated Contact Person listed in Sub-paragraph 2(f) of the enclosed Supporting Notice.

17. If the members' data is held solely on MOD-owned/maintained systems (be they standalone, intranet or internet based), then this will be indicated on the enclosed Supporting Notice. In these circumstances the MOD is the Joint Data Controller. The point of contact for data protection within the MOD is:

E-mail: CIO-DPA@mod.gov.uk

Address: The MOD Data Protection Officer,
Ground Floor Zone D,
MOD Whitehall,
LONDON
WC1A 2HB

Further information

18. If members have concerns or questions about how their data has been processed, they should contact the club/society's Nominated Contact Person in the first instance, in accordance with the details in Sub-paragraph 2(f) of the enclosed Supporting Notice.

19. In the member is unable (or unwilling) to do so, or has any residual concerns after liaising with the club/society, he/she may contact their local Data Protection Adviser or:

a. The Air Command Data Protection Team:

E-mail: AIR38Gp-A6InfoPolGrpMB@mod.gov.uk

Post: Air Data Protection Adviser,
A6 Information Policy,
Room 48, Gauntlet Block,
RAF High Wycombe,
HIGH WYCOMBE.
HP14 4UE

b. The MOD Data Protection Officer (details as shown in Paragraph 17).

c. Alternatively, the member may wish to seek the advice from, or complain to, the Information Commissioner's Office by visiting its website at www.ico.org.uk.

Enclosure:

1. RAFDP/PNS/1V1 Dated 1 Jul 19 – Data Protection Privacy Notice (Supporting): Social/Recreational Data Processing.

**DATA PROTECTION PRIVACY NOTICE (SUPPORTING):
SOCIAL/RECREATIONAL DATA PROCESSING**

Reference:

A. RAFDP/PNG/1V1 dated 1 Jul 19. Data Protection Privacy Notice (General Notice): Social/Recreational Data Processing.

1. The following details are provided to expand on the contents of the associated 'General Notice' and should be read in conjunction with it (Reference A).

2. The details of the club/society are as follows:

a. Club/Society Name: RAF Waddington Tang Soo Do Club

b. Club's/society's aims: To provide self defence and fitness training through Tang Soo Do martial arts training.

c. Members' personal details are held solely on MOD-owned/maintained systems (see Paragraph 17 of the General Notice and, if under joint control, the [MOD Privacy Notice](#)).

d. Members' special category data is not held (see Paragraph 7 of the General Notice).

e. Members' consent is not sought for marketing purposes (see Paragraph 6(e) of the General Notice). Members data is not used for marketing purposes.

f. Contact details of the club/society:

(1) Nominated Contact Person (Name & Role): Flt Lt C Davis

(2) E-mail: chris.davis338@mod.gov.uk

(3) Postal address: SO3 Performance and Plans, Air Warfare Centre, Royal Air Force Waddington, LINCOLN, LN5 9WA