

## **GDPR Compliance statement**

The General Data Protection Regulations (GDPR) which come into force on the 25<sup>th</sup> May 2018 build upon the Data Protection Act 1998 and the EU Privacy and Electronic Communications Regulation (PECR) 2003. GDPR take the requirements for data protection, capture and use as already enacted in the laws above; and provides additional data transparency and control on organisations whilst empowering individuals with the right to know what is being stored, how it is being used and the procedure for correcting or removing their details.

HJMA, captures, processes and uses individual member's information for the sole purpose of administering the club membership and related activities. Where we pass your information to 3<sup>rd</sup> parties, we do so specifically for club affiliation purposes (e.g membership of IMASA), for insurance purposes and for ordering membership slips. We may also disclose information to other third parties for the booking of events such as competitions. Where we share information with other parties it will always be the least amount possible and only where specifics are requested.

All HJMA members' personal information held by HJMA is processed under GDPR category of "Legitimate Interest". The following table identifies what we capture, where it is stored, and why we need it.

Da <sup>ta</sup>	IMASA	Event of an petition	5) First hid response	
First Name	Yes	Yes	Yes	
Surname	Yes	Yes	Yes	
Licence Number (Insurance)	Yes	No	No	
Date of Birth	Yes	Yes	No	
Email	No	No	No	
Contact number	No	No	No	
Medical Notes	No	If required	If required	
Next of Kin	No	If Required	If Required	
Next of Kin Phone number	No	If Required	If Required	
		To enable event		
		entry and set	To enable	
	For insurance	correct	effective first aid	
Why!	requirements	categories	response	

# Data Identification:

-"Membership Form" – The paper form completed when you join. We then scan and shred original.

"Membership Roll"; The processed data from the form into a simplified form

"Attendance record" ; The digital record to track session numbers.



# **Data Limitations**

members who communicate their personal details to 3<sup>rd</sup> Parties directly should direct all GDPR enquiries to the organisation directly. Where HJMA follow up or communicate on your behalf (e.g. official confirmation you are a member of HJMA), please contact **HJMA** to ascertain the information transferred.

## Data Accuracy:

It is beholden on HJMA to ensure total data accuracy. Any HJMA member may request to see what data is stored by HJMA, how it has been used, and the procedures in place to ensure data protection. Please do this via email to HJMA@hyungje.org, clearly stating that it is for a "GDPR Information Request" HJMA will have not more than 30-days in which to respond and, although unlikely, may levy a proportionate fee to provide said information. Should you require corrections to your data (e.g. moving house, change of contact number) please inform a member of the HJMA team at your earliest convenience. Where data has been passed to 3<sup>rd</sup> Parties, and that data is now incorrect, GDPR places a burden on HJMA to forward the corrected data to the 3<sup>rd</sup> Party so they may update their records. Under GDPR, individuals have the right to also request data transparency directly with the 3<sup>rd</sup> party(ies).

For non HJMA members and people who have contacted HJMA via a public-facing medium (e.g. email, website, Facebook, twitter, Instagram etc.) we will store your details as long as is necessary to facilitate your enquiry or action request. If you are on a waiting list, your details will be kept for as long as that list is in existence PLUS 12 months. This is so we can inform you if future places open up if you are unable to join first time around. If you engage in business dealings/transactions with HJMA, we will keep your information indefinitely (e.g. email address, name, email contents) as a record of the club business dealings and in case of audit. Where possible, data will be anonymised or deleted.

For HJMA members who leave the club/ membership is not renewed, your details will be kept on file for at least 6 months after your membership lapses (Until next membership cycle and data clean) at which point it will be anonymised or deleted. Attendance records will be kept indefinitely, with personal information (names) anonymised to ensure GDPR Compliance.

#### **Requesting Data Transparency**

GDPR place responsibility on HJMA to ensure we can let you know precisely what information we hold on you, what it looks like (the actual Data) and the procedures for keeping it safe. Please address all GDPR requests to the admin team via <u>HJMA@hyungje.org</u> with the subject line "GDPR information request". HJMA has 30-days in which to reply and although unlikely, is permitted to levy a proportionate fee. HJMA reserves the right to refuse GDPR information requests should they be deemed spurious or an abuse of the regulations.

# Data Breach notification:

HJMA take data protection extremely serious and all data is stored securely on our "Dojo Expert" cloud based CRM system and the club Dropbox drive that has access limited to the serving club admin team. We rely on notification from Dropbox / Dojo Expert should their systems be compromised, and undertake to remedy such breaches as a matter of urgency, including removing stored data from the drive to a secure local computer unit until such a time the online storage is secured once more. Where breach has occurred, we will inform all members as well as the ICO within 72 hours.



## **GDPR Compliance Procedure:**

Should you feel that HJMA has failed in some aspect of the GDPR and the processing of your personal data; in the first instance, please inform the HJMA admin team so that we may investigate and seek to correct our systems should they require it. If one of our responses to your complaint is unsatisfactory, you should contact the Information Commissioner's Office (ICO) and utilise their procedure: <a href="http://ico.org.uk/for-the-public/raising-concerns/">http://ico.org.uk/for-the-public/raising-concerns/</a>

## **Data protection Officer**

The HJMA Chief instructor is the defacto Data protection Officer, although it is the responsibility of all HJMA admin team to ensure data security and compliance.