



Regulation 4.1 – Data Protection & GDPR Policy

Effective date: June 2025

Acknowledgements

MUSC CIC would like to express our thanks to the following organisations who have assisted in the development of this policy

Information Commissioner's Office <https://ico.org.uk/for-organisations/uk-gdpr-guidance-and-resources/>

The UK's data protection legislation <https://www.gov.uk/data-protection>

POLICY STATEMENT

Mariners United Sporting Club CIC (MUSC CIC) is committed to protecting the personal data and privacy of all individuals whose information it processes. This includes participants, members, athletes, volunteers, staff, contractors, partners, donors and members of the public. MUSC CIC recognises its responsibilities as a data controller and, where applicable, a data processor, and is committed to complying fully with UK data protection legislation.

MUSC CIC will ensure that personal data is collected, stored, used and shared responsibly, securely and only for legitimate organisational purposes. The organisation recognises that effective data protection is essential to maintaining trust, safeguarding individuals, and ensuring good governance.

1. INTERPRETATION

For the purposes of this regulation, personal data means any information relating to an identified or identifiable living individual. Special category data includes information relating to health, ethnicity, safeguarding, biometric data or other sensitive personal characteristics. Processing refers to any operation performed on personal data, including collection, recording, storage, use, sharing or deletion. Data subjects are the individuals to whom the personal data relates.

This policy applies to all MUSC CIC directors, staff, volunteers, coaches, officials, contractors and anyone acting on behalf of MUSC CIC who processes personal data in the course of their role.

2. SCOPE AND APPLICATION

This regulation applies to all personal data processed by MUSC CIC in any format, including electronic records, paper files, databases, images, video, audio recordings and online systems. It applies to data processed in relation to events, competitions, training programmes, safeguarding activities, funding applications, employment, volunteering, partnerships, marketing and communications.

This policy applies regardless of whether data is processed at MUSC CIC premises, at event venues, remotely or through third-party systems.

3. DATA PROTECTION PRINCIPLES

MUSC CIC shall process personal data in accordance with the data protection principles set out in UK GDPR. Personal data shall be processed lawfully, fairly and transparently, collected only for specified, explicit and legitimate purposes, and limited to what is necessary for those purposes. Data shall be accurate and kept up to date, retained only for as long as necessary, and processed in a manner that ensures appropriate security and confidentiality.

MUSC CIC accepts accountability for demonstrating compliance with these principles.

4. LAWFUL BASIS FOR PROCESSING

MUSC CIC shall only process personal data where there is a lawful basis to do so. This may include consent, contractual necessity, compliance with legal obligations, protection of vital interests, performance of tasks carried out in the public interest, or legitimate organisational interests. Where special category data is processed, MUSC CIC shall ensure that an additional lawful condition applies, such as explicit consent or safeguarding obligations.

Consent, where relied upon, shall be freely given, specific, informed and capable of being withdrawn.

5. RESPONSIBILITIES

The MUSC CIC Board of Directors holds overall responsibility for ensuring that appropriate data protection governance arrangements are in place. The Board shall ensure that this policy is implemented, reviewed and supported by appropriate procedures and controls.

All MUSC CIC staff, volunteers and representatives are responsible for complying with this policy, handling personal data responsibly and reporting any data protection concerns or incidents promptly. Individuals must only access personal data that is necessary for their role and must not disclose personal data without proper authorisation.

Where third-party processors are used, MUSC CIC shall ensure that appropriate contractual arrangements are in place to protect personal data.

6. DATA SECURITY

MUSC CIC shall take appropriate technical and organisational measures to protect personal data against unauthorised access, loss, destruction or disclosure. This includes secure storage, controlled access, password protection, encryption where appropriate and secure disposal of data. Paper records shall be stored securely, and electronic data shall be protected through suitable IT and access controls.

Personal data shall not be stored on personal devices or shared via unsecured systems unless authorised and appropriately protected.

7. DATA SHARING

MUSC CIC shall only share personal data where it is lawful, necessary and proportionate to do so. Data may be shared with partners, funders, governing bodies, safeguarding authorities or emergency services where required, provided appropriate safeguards are in place. Individuals shall be informed about how their data may be shared through privacy notices or consent processes.

8. DATA RETENTION

MUSC CIC shall retain personal data only for as long as necessary to fulfil the purposes for which it was collected and to meet legal, regulatory or safeguarding requirements. Data shall be securely deleted or destroyed once it is no longer required. Retention periods shall be documented and reviewed periodically.

9. INDIVIDUAL RIGHTS

MUSC CIC recognises and respects the rights of individuals under data protection law. These include the right to access personal data, request rectification or erasure, restrict or object to processing, and the right to data portability where applicable. Requests relating to individual rights shall be handled promptly and in accordance with statutory timescales.

10. DATA BREACHES

Any actual or suspected personal data breach must be reported immediately to MUSC CIC. A data breach includes any loss, unauthorised access, disclosure or destruction of personal data. MUSC CIC shall investigate breaches promptly and, where required, report them to

the Information Commissioner's Office and affected individuals in accordance with legal requirements.

11. TRAINING AND AWARENESS

MUSC CIC shall ensure that directors, staff and volunteers are provided with appropriate information and guidance on data protection responsibilities relevant to their roles. Data protection awareness forms part of MUSC CIC's commitment to good governance and safeguarding.

12. REVIEW AND COMPLIANCE

This policy shall be reviewed annually by the MUSC CIC Board or sooner if there are changes to legislation, organisational activities or data processing practices. Failure to comply with this regulation may be treated as a breach of MUSC CIC policies and may result in disciplinary action.

13. RELATED DOCUMENTS

This policy should be read in conjunction with MUSC CIC's Privacy Notice, Safeguarding Policy, Information Security Procedures, Record Retention Schedule and Incident Reporting Procedures.