



DATA PROTECTION STATEMENT

This statement explains how Kent County Rugby Football Union Ltd (KCRFU) handles and uses the personal details which it collects about its Members, Associated Clubs, Individual Associates, Corporate Associates and officials of KCRFU in any capacity (hereinafter collectively called Members) and players of the game of Rugby Union Football (the Game). Retention of this information regarding Members and players enables KCRFU to keep in touch with them in order to keep them advised of KCRFU activities, and to enable KCRFU to discharge its responsibilities and to pursue its legitimate interests as a County Governing Body of a National Sport, i.e. the Game. Data may be shared with the Rugby Football Union (RFU) which may use such data to regulate, develop and manage the Game. KCRFU is committed to protecting all personal information and being open about the nature of the information which it holds. In the event that KCRFU or RFU rely upon an individual's consent for holding such data, such consent may be withdrawn at any time.

The extent of this Policy:

This policy describes how KCRFU will make use of the data which it handles in pursuit of its legitimate interests, including its use of the Game Management System (GMS) provided by RFU, and also describes the RFU's use of data on GMS. It also describes Members' data protection rights, including a right to object to some processing which KCRFU may carry out.

Personal Data Collected and Held:

The personal information held by KCRFU will primarily be that provided by Members and players (or, in the case of minors, by their parents) in correspondence from Members by post, telephone, email or otherwise. On occasion, details regarding Members and players may be received from rugby clubs within the County of Kent or RFU.

The records may contain:

- Contact details as supplied and periodically updated by Members and players.
- The name, gender, and date of birth of individuals.
- An individual's RFU ID (as assigned in GMS).
- Passport and/or NI details.
- Club affiliations and details of membership, offices, and positions held within the Game.
- Bank account details when provided for payment of membership or other fees or to enable KCRFU to make payments.
- Personal data supplied by Members and players for specific purposes (e.g. injuries, medical conditions and disability requirements).



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- Any qualifications or work experience supplied by an individual

Some information will be generated as part of an individual's involvement with KCRFU, including development, training, performance, involvement in particular matches, details of disciplinary issues, and health and safety records.

Information received from third parties:

KCRFU may receive information from third parties, e.g. information regarding a minor supplied by parents. KCRFU may also receive information relating to existing registrations with other clubs or rugby bodies, or disciplinary history from RFU through GMS, and, especially in the case of those working with children, information from the Disclosure and Barring Service and RFU.

Use of Personal Data by KCRFU:

Members' Personal Data is used by KCRFU for:

- Sending to Members and players details of its activities and inviting them to attend events.
- Collecting subscriptions and other payments which may be due.
- Discharging its responsibilities as a County Governing Body of Sport and as prescribed by RFU.
- Internal record-keeping.
- Administrative purposes.
- Purposes required by law, e.g. maintenance of accounting and health and safety records, compliance with the requirements of government and law enforcement authorities.

Use of Personal Data by RFU:

The RFU provides GMS but makes its own use of the following information:

- The name, date of birth and gender of individuals
- An individual's RFU ID (as assigned in GMS)
- Contact details
- Involvement in KCRFU teams and administration.

The RFU uses this information as follows:

To conduct its business and to pursue its legitimate interests, in particular:

- a) Communicating with or about individuals where necessary to administer the Game in England, including responding to valid questions sent to the RFU about GMS.



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- b) Administering and ensuring the eligibility of players, match officials, and others involved in the Game in England, which may involve the receipt of limited amounts of sensitive data in relation to disabled players where they are registered for a disabled league or team, or in relation to anti-doping matters.
- c) Maintaining records of the Game, in particular, maintaining details of discipline and misconduct.
- d) Monitoring use of GMS and using this to help it, monitor, improve and protect its content and services and investigate any complaints received about GMS.
- e) Maintaining statistics and conducting analysis on the make-up of the Game's participants.
- f) Ensuring compliance with all current RFU Rules and Regulations.
- g) Communicating to seek opinions on RFU initiatives.
- h) For purposes required by law, e.g. to ensure that those working with children have undergone, with their consent, an appropriate DBS check, providing information to government or law enforcement agencies carrying out an investigation.

Direct Marketing:

KCRFU will not use personal data for any direct marketing purposes whatsoever.

Sharing of Data:

KCRFU may share some limited information with other stakeholders in the Game, such as other Constituent Bodies, clubs, schools, academies, recognised development organisations with whom KCRFU deals for legitimate purposes, referee societies, league organisers, in order that they may maintain appropriate records, and assist in organising matches, administering the Game and developing players.

Personal data may be shared with government authorities and/or law enforcement agencies if mandated by law, or if required for the legal protection of the legitimate interests of KCRFU and RFU in compliance with applicable laws.

Personal data may also be shared with third-party service providers who will process it on behalf of KCRFU.

Members' and players' Rights:

Members and players have the right to:

- Ask KCRFU or RFU for access to, or rectification or erasure of, their individual data Provided that KCRFU and RFU will not delete information



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which it is required to keep by law, or to comply with RFU Rules and Regulations.

- Restrict the data provided, subject to the proviso above.
- Object to the receipt of communications by any specific method.
- Request the transfer of their individual data to a third party.

Members have the right to lodge a complaint with the Information Commissioner's Office at <https://ico.org.uk/concerns/>

Retention of Data:

Members' and players' personal data will be processed for as long as they retain their membership or active involvement with KCRFU and for up to six years thereafter. KCRFU will retain information to maintain statutory records in line with appropriate statutory requirements or guidance. The RFU will maintain records of individuals 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 on www.englandrugby.com Records of an individual's involvement in a particular match, on team sheets, on results pages or in match reports may be held indefinitely by KCRFU and RFU in order to maintain a record of the game.

Further Information:

The legal basis for processing your personal data for the purposes set out above is that it is necessary for the pursuit of KCRFU's legitimate interests. KCRFU always handles personal data securely and minimises its use, and there is no overriding prejudice to Members and players by using their personal information for these purposes. However, there is no statutory or contractual requirement for Members and players to provide KCRFU with any personal data.

Those who have concerns or questions about the information contained in this statement, or who do not want KCRFU to process their personal data for specific purposes, should contact the KCRFU office at Worrall House, 30 Kings Hill Avenue, Kings Hill, Kent, ME19 4AE, Tel: 01732 529689, email: office@kent-rugby.org Where Members or players have specific requests relating to the management of their personal data, KCRFU will endeavour to resolve these but there may be circumstances where it is unable to comply with a specific request. Anyone who has any concerns about how the RFU processes their data should get in touch at legal@rfu.com or write to The Data Protection Officer, Rugby Football Union, Twickenham Stadium, 200 Whitton Road, Twickenham, TW2 7BA.