HARINGEY HEAT BASKETBALL CLUB (CIC)

Data Protection Policy (UK GDPR)

V2.1 — Updated November 2026

1. Introduction

Haringey Heat Basketball Club (CIC) is committed to protecting the personal data of all members, participants, parents, carers, coaches, volunteers and staff. This policy sets out how we collect, hold, use and protect personal data in compliance with the UK General Data Protection Regulation (UK GDPR) as incorporated into UK law by the Data Protection Act 2018.

As a community sports club working with young people under 18, we recognise that the personal data we hold — including medical information, emergency contacts and images — requires particular care and sensitivity. We take our obligations under UK GDPR seriously.

2. Data We Hold and Why

2.1 What data we collect

Haringey Heat Basketball Club collects and holds the following categories of personal data:

- Members and participants: name, date of birth, age group, address, email, telephone number, emergency contacts, medical conditions and allergies, photo/video consent status
- Parents and carers: name, email, telephone number, relationship to participant
- Coaches and volunteers: name, email, telephone, DBS check reference (through Basketball England), qualifications, next of kin
- Financial data: payment records via GoCardless (memberships), SumUp (session fees), Goodhub (donations)
- Registration and attendance data: AidaForm registration responses, session registers

2.2 Why we collect it

We collect personal data for the following lawful purposes under UK GDPR:

- By consent: to communicate with members and parents about club activities, sessions and events
- By contract: to manage membership agreements and session bookings
- By legal obligation: to comply with safeguarding requirements, DBS checks and HMRC obligations
- By legitimate interest: to operate the club effectively and safely, including maintaining session registers and emergency contact information

3. Data Controller

The Data Controller for Haringey Heat Basketball Club is the Board of Directors. Day-to-day responsibility for data protection compliance is held by the Club Secretary:

Nikki Distras, Club Secretary

haringeyheatbasketball@outlook.com | 07814 076541

In the considered opinion of the Directors, the scale and nature of personal data held by Haringey Heat Basketball Club does not require the appointment of a Data Protection Officer. This assessment will be reviewed annually.

4. How We Store Data

4.1 Digital systems

Member registration data is collected and stored via AidaForm (our registration platform) and MemberMojo (our membership management system). Both platforms are UK GDPR compliant. Payment data is processed by GoCardless, SumUp and Goodhub — all of which are compliant data processors. Trial session enquiries made through the form on our website are sent to the club by FormSubmit, an email form service, and our website is hosted by Netlify.

The club also holds data in Google Workspace (Gmail, Google Drive). Access to all digital systems is restricted to the Club Secretary and Directors.

4.2 Physical data

Physical documents containing personal data (such as signed consent forms, accident records and DBS documentation) are held securely by the Club Secretary and are not accessible to unauthorised persons.

4.3 Data security

All personal data is held securely with access restricted to those who need it. Personal data will never be transmitted electronically in an unprotected format. Devices used to access club data are password protected. Personal data is not stored on unencrypted removable media.

5. Data Retention

Personal data will not be retained for longer than necessary:

- Active member data: held for the duration of membership plus one year after leaving the club
- Medical and emergency contact data: held for the duration of membership
- Financial records: held for 7 years in line with HMRC requirements
- DBS records: held for 6 months after a recruitment decision, then securely destroyed
- Accident and incident records: held for 3 years (or until the young person reaches 21, whichever is longer)
- Photographic consent records: held for the duration of membership

Data will be reviewed at least every 12 months and data no longer required will be securely deleted or destroyed.

6. Individual Rights

Under UK GDPR, individuals have the following rights in relation to their personal data held by Haringey Heat Basketball Club:

- The right to be informed about how their data is used
- The right of access to their personal data
- The right to rectification of inaccurate data
- The right to erasure (‘the right to be forgotten’) where applicable
- The right to restrict processing
- The right to data portability
- The right to object to processing

To exercise any of these rights, individuals should contact the Club Secretary in writing at haringeyheatbasketball@outlook.com. We will respond within one month of receiving a request.

7. Children’s Data

As a club working primarily with young people under 18, we take particular care with children’s data. Consent for data collection is obtained from parents or carers via the AidaForm registration process. Data relating to young people is never shared without parental consent except where required by law or safeguarding obligations. Coaches and volunteers do not hold personal data on young people on personal devices.

8. Third Party Data Processors

Haringey Heat Basketball Club uses the following third-party data processors, all of whom are UK GDPR compliant:

- AidaForm — registration and consent data collection
- MemberMojo — membership management
- GoCardless — membership fee payments
- SumUp — session fee payments
- Goodhub — donations and Gift Aid
- Google Workspace — email and document storage
- FormSubmit — website trial session enquiry form
- Netlify — website hosting
- Basketball England — DBS checks and club registration

Haringey Heat Basketball Club will not share personal data with any other third party without the explicit consent of the data subject, except where required by law or safeguarding obligations.

9. Data Breach

In the event of a data breach, the Club Secretary will assess the risk to individuals and notify the Information Commissioner's Office (ICO) within 72 hours where the breach is likely to result in a risk to individuals' rights and freedoms. Affected individuals will be notified without undue delay where the breach is likely to result in a high risk to their rights and freedoms.

To report a data breach or concern: ICO helpline 0303 123 1113 | ico.org.uk

10. Photography and Images

Haringey Heat Basketball Club obtains explicit consent from parents/carers via the AidaForm registration process before taking or publishing photographs or video of young people. Images are used only for club promotional purposes (website, social media, Basketball England reporting). Parental consent can be withdrawn at any time by contacting the Club Secretary. No images of young people are published with personal details attached.

11. Review

This policy will be reviewed annually by the Club Secretary and Board of Directors, or sooner if there are changes to UK GDPR requirements or the club's data processing activities.

ICO registration: Haringey Heat Basketball Club maintains its ICO registration as required.

Date: November 2026

Date of Review: November 2027

Version: V2.1

Approved by the Board of Directors, November 2026

Nikki Distras, Club Secretary

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