



# RKB Leisure Ltd Privacy Statement

## 2019 - 2020

### Commitment

RKB Leisure Ltd is committed to meeting its obligations under the General Data Protection Regulation 2018 in respect to the data it holds and processes about its members..

In particular, data will be:

- Processed lawfully, fairly and transparently
- Collected for specified, explicit and legitimate purposes
- Adequate, relevant and limited to what is necessary
- Accurate and kept up to date where necessary
- Kept for no longer than is necessary where data subjects are identifiable
- Processed securely and protected against accidental loss, destruction or damage.

This Statement sets out how RKB Leisure Ltd uses and protects your personal data.

This statement is effective **from Friday 24<sup>th</sup> May 2019** and replaces any previous data policies, statements or contractual clauses relating to data protection.

### How we comply

What is personal data	<p>Personal data is data that relates to an identified or identifiable individual and is:</p> <ul style="list-style-type: none"><li>• Processed electronically</li><li>• Kept in a filing system</li><li>• Part of an accessible record, for example an education record</li><li>• Held by a public authority.</li></ul> <p>Sensitive Personal Data are special categories of personal data that includes such things as racial/ethnic origin, trade union membership, religious and or political, health.</p>
Why we collect and hold Personal Data	<p>RKB Leisure Ltd collects, holds and processes members personal data in order for to discharge its legal and contractual obligations, and to manage its memberships.</p> <p>Only relevant information that enables RKB Leisure Ltd to perform its duties is collected, processed and stored.</p> <p>RKB Leisure Ltd does not collect or hold Sensitive Personal Data.</p> <p>Information is not kept longer than is relevant or legally required.</p>
Data Controller and Processors	<p>RKB Leisure Ltd is a data 'controller' as it determines the purpose and means of data collection.</p> <p>RKB Leisure Ltd may engage data 'processors' to deliver its.</p>
What Personal Data to we collect	<p>Attached is a table of what information that RKB Leisure Ltd collects, and the grounds for processing it.</p>
How we collect Personal Data	<p>RKB Leisure Ltd collects data directly from its members or from sources specified by the members.</p>
How we store Personal Data	<p>Personal Data is stored as follows:</p> <p>Structured data:</p> <ul style="list-style-type: none"><li>• Hard copy documents in locked cabinet(s)</li></ul>

	<ul style="list-style-type: none"> <li>• Electronic files on a secure company drive</li> </ul> <p>Unstructured data</p> <ul style="list-style-type: none"> <li>• Emails retained in files on administrator and manager's email accounts</li> </ul>
<p>Who we share personal Data with</p>	<p>Personal Data is shared with external providers (data processors) who are engaged by RKB Leisure Ltd in order for the company to discharge its duties and obligations. Examples include:</p> <ul style="list-style-type: none"> <li>• Insurance brokers</li> <li>• External professional advisors such as the company's legal advisors.</li> </ul> <p>All of the above are based within the EU.</p> <p>Your personal details are not disclosed to other members.</p> <p>RKB Leisure Ltd does not transfer data about its members outside the EU.</p>
<p>How we maintain accurate records</p>	<p>Members should notify RKB Leisure Ltd of any changes to their personal details.</p> <p>Annually (usually in May) RKB Leisure Ltd asks members to reapply for their membership and confirm that their contact details are correct.</p> <p>If you are aware there is a factual error in the personal data that the company holds about you should email/write to RKB Leisure Ltd and request that the information be changed.</p>
<p>Subject Access Requests</p>	<p>Members may view data held by the company by submitting a Subject Access Request (SAR).</p> <p>Subject Access Requests must be in writing, addressed to The Managing Director, RKB Leisure Ltd, Borough Green Sand Pits, Platt Industrial Estate, St Marys Platt, Borough Green, Kent, TN15 8JL and include the following:</p> <ul style="list-style-type: none"> <li>• full name, address and contact details</li> <li>• details of the specific information required and any relevant dates.</li> </ul> <p>RKB Leisure Ltd will make data available to the member within a month.</p> <p>RKB Leisure Ltd reserves the right to refuse or charge for requests that are manifestly unfounded or excessive. Where requests are refused or a charge imposed, RKB Leisure Ltd will explain why.</p> <p>How data will be provided:</p> <ul style="list-style-type: none"> <li>• Print out of membership database information</li> <li>• Photocopy of hard copy documents membership file</li> <li>• IT search of email system for emails relating to individual</li> </ul>
<p>Employee responsibilities</p>	<p>Every employee is responsible for ensuring that the Company operates effective data protection.</p> <p>The confidentiality clause in the contract of Employment outlines employee's responsibilities in maintaining the confidentiality of data of the company, its members, suppliers and joint venture partners.</p> <p>It is your responsibility to maintain the confidentiality of the data that you handle.</p> <p>Managers who retain data about team members must ensure that it is kept on a password protected device or in a locked file.</p> <p>Employees who handle data unlawfully or causes a risk or breaches of confidentiality will be treated as Gross Misconduct under RKB Leisure's Disciplinary Procedure the outcome of which may include dismissal without notice.</p>



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Breaches of personal data	If you become aware of a data breach you must notify RKB Leisure Ltd immediately.
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