**Club/Society**

**Data Audit Template**

It is important to regularly review and be aware of personal data being processed.

WHO – whose personal data, WHAT personal data, WHY – the purpose (and lawful basis) for processing, WHEN – at what point and for how long, and WHERE – secure storage and destruction.

**Whose data do we collect?**

Identify the different categories of persons (data subjects) about whom you process personal data

(e.g. members, judges, exhibitors/competitors, ring stewards)

**What data do we collect?**

Identify what personal data you collect, process and store for each type of data subject and the source of that data i.e. is it given to you by that individual or by someone else?

(e.g. name, address, email address, telephone, date of birth, financial details etc.)

**Why do we collect that data? Do we have a function/reason for every piece of data we collect?**

Identify the function/reason for collecting/processing the data (and decide which GDPR legal basis applies). This is likely to be contractual/legal necessity, legitimate interests or consent

Legitimate interests include relevant activities which are necessary (and usually something a member or exhibitor/competitor would reasonably expect the club/society to be doing).

E.g.

To provide membership services – contractual necessity

To comply with Club/Society Constitution – contractual necessity

To comply with KC Rules and Regulations – contractual necessity

Publication of Year Book/Newsletters – legitimate interests

Reserve the ‘opt-in’ consent IF the club direct markets other services to the members BY EMAIL

**Where do we store the data?**

Identify where the data is stored

(e.g. manual records, electronic records/databases, email lists, cloud services)

Identify how you protect and document the data that you have

(e.g. passwords, limited access)

**Check no data is stored outside the EU**

**When do you retain the data until?**

Identify how long you keep the data for, OR what criteria the retention period is determined by

It is not enough to say ‘indefinitely’ – so you need to specify a period OR state that a criteria is used, e.g. the club’s retention policy – which could be available for inspection.

There will be statutory time limits e.g. financial and KC regulations and so on.

Identify if you disclose the data to any other recipients

**Notes:**

**Data Subjects:**

It is likely that your categories of data subjects will consist of members, judges and entrants to events. However, please do consider if you have any further data subjects.

**Recipients:**

Identify whether you disclose data to any outsourced data processor (e.g. Fosse Data or Higham Press for printing). Check with the show printer/entry handler direct.

**Marketing:**

Identify if you are marketing to any of your data subjects. If you are marketing by email you will require individuals’ consent. You may need to take independent advice to ensure compliance.

**Email Addresses:**

Avoid publishing email addresses online. If you publish email addresses on the web, make it unscannable so that it cannot be harvested. There are alternative ways to display an email address which in turn makes it hard for cyber criminals to harvest it. You should take independent advice if appropriate.