PRIVACY NOTICE

Version	Date	Next Review	Policy Owner
1.0	November 2026	November 2027	Data Officer

1. Introduction

Hackney Rugby Football Club is committed to protecting the privacy and personal data of all members, volunteers, players, parents, guardians, coaches, and visitors.

Hackney Rugby Football Club Ltd (company no. 06917207, registered charity no. 1131238), 75 De Beauvoir Road, London, N1 4EL, is the data controller for the personal data described in this notice. The RFU is a separate data controller for data held on its Game Management System (GMS).

This Privacy Notice explains what personal data we collect, why we collect it, how we use it, with whom we share it, and what rights you have. It applies to all club activities including membership, participation, events, volunteering, and communications.

We process personal data in accordance with UK data protection law, including the UK GDPR and the Data Protection Act 2018.

This notice should be read alongside our Safeguarding Policy and Code of Conduct.

2. Who This Notice Covers

This notice applies to:

- Adult members (aged 18 and over)
- Junior members (aged under 18) — data held on behalf of their parent or guardian
- Parents and guardians of junior members
- Volunteers, coaches, officials, and committee members
- Visitors to Club premises or Club-run events
- Prospective members who have expressed an interest in joining
- Donors, including people who make a Gift Aid declaration
- Referees named by people applying for volunteer roles

3. Data We Collect and Why

The table below sets out the categories of personal data we collect, the purpose for which we collect it, and the lawful basis under UK GDPR on which we rely.

Category	Data collected	Purpose	Lawful basis
Personal details	Name, date of birth, address, email, phone number	Membership administration and communication	Contract (membership); Legitimate interests
Emergency contact	Name and phone number of a named contact	To contact in an emergency during club activities	Vital interests

Category	Data collected	Purpose	Lawful basis
Medical information	Conditions, allergies, medications relevant to participation	Safeguarding — to keep members safe on the pitch and at events	Vital interests; Explicit consent (special category)
EDI data	Ethnicity, gender identity, disability status, socio-economic indicators, school type	Equality monitoring, Sport England reporting, RFU Rugby for All compliance	Explicit consent (special category — optional)
Photo & video	Images and footage captured at club activities; whether your name appears in published team sheets, results and posts	Club communications (website, social media, match reports)	Consent — you can change your photo permission and publication consent at any time in your Teamo profile
Dietary requirements	Food preferences and intolerances relevant to catering	Catering at club events and away fixtures	Consent (explicit consent where it reveals health or religious information)
Communication preferences	Preferred channels; opt-in to third-party partner messages	Member communications and club CRM	Consent; Legitimate interests
Volunteer information	Role, skills, availability, DBS status, qualifications	Volunteer coordination, DBS compliance, safeguarding	Legitimate interests
Safer recruitment	Self-declaration of convictions and cautions, work and volunteering history, reference outcomes, DBS certificate number and date (Volunteer Self-Declaration)	Safer recruitment for roles with children or adults at risk (RFU Regulation 21)	Legitimate interests; criminal offence data under the Data Protection Act 2018, Schedule 1 (safeguarding of children and individuals at risk), covered by our Appropriate Policy Document
Referee details	Name, position, organisation and contact details of referees named by applicants	Taking up references	Legitimate interests
Financial data	Payment records and Gift Aid declarations (processed via Zeffy / PayPal / Stripe)	Fee collection, accounting, Gift Aid	Contract; Legal obligation
Injury and incident records	Injury and incident reports; insurance claims; type of evidence for the Injured Player membership (not the diagnosis)	Safety, insurance and RFU reporting; reduced membership rate	Legitimate interests; vital interests; legal claims; explicit consent
Hardship applications	Financial circumstances shared with the Senior Fellowship Fund or Bursary	Assessing applications in confidence	Consent; legitimate interests
CCTV footage	Images captured on CCTV at club premises (operated by Hackney Council)	Security and crime prevention — we have no control over or access to footage	Hackney Council responsibility

Special category data (medical information and EDI data) is processed only with your explicit consent, except where it is necessary to protect vital interests. You can withdraw consent at any time; this will not affect any processing already carried out. We ask for your consent to use medical information on the Teamo registration form. You can withdraw it at any time by updating your answer in Teamo or emailing data@hackneyrfc.co.uk, and we will then delete your medical information.

EDI data is collected to help us understand who plays at Hackney RFC so that we can improve inclusion and meet our reporting obligations to Sport England and the RFU. Where you provide EDI information, it is stored against your membership profile in Teamo, accessible only to Club administrators. When we report on EDI, we use only anonymised, aggregated data — no information is ever shared in a form that could identify you personally.

4. Who We Share Data With

We do not sell, rent, or trade personal data. We do not make decisions about you by automated means. We share data only where necessary for Club operations, as set out below.

Recipient	Country	Purpose	Safeguard
Teamo	UK	Member management platform — registration forms, profiles, team communication	Data Processing Agreement in place
RFU / GMS	UK	Player registration — mandatory for all playing members; DBS checks; safeguarding concerns reported to the RFU; insurance claims via England Rugby Insurance	RFU Privacy Policy applies
Payment processors	UK / USA	Processing membership fees and event payments (e.g. Zeffy, PayPal, Stripe)	PCI-DSS compliant; own privacy policies apply
Google Workspace	UK / USA	Club email, the Volunteer Form and Volunteer Self-Declaration, and club files	Google's data processing terms
Wix	USA / other	Club website, including Gift Aid declarations made there	Wix's data processing terms
Swiftaid	UK	Gift Aid claims on online donations	Own privacy policy applies
HMRC	UK	Gift Aid claims — donor name, home address and donation amounts	Legal requirement
Social media platforms	USA	Photos and videos posted with member consent (e.g. Instagram, Facebook, LinkedIn)	Own privacy policies apply; consent obtained before posting
Sport governing bodies	UK	Anonymised, aggregated EDI data only — for equality reporting to Sport England and the RFU	No personal data shared
Police, local authority and other statutory agencies	UK	Where necessary to protect a child or adult at risk; this may be without consent	Shared only as needed and recorded by the Club Safeguarding Officer
Emergency services and insurers	UK	Medical emergencies and insurance claims	Shared only as needed

Where data is shared with organisations outside the UK, we ensure appropriate safeguards are in place. We keep a record of the data processors we use.

5. CCTV

CCTV cameras are present at our Spring Hill ground. The CCTV system is owned and operated entirely by Hackney Council. We have no control over or access to footage. Any queries about CCTV data should be directed to Hackney Council.

6. How Long We Keep Your Data

We keep personal data only for as long as necessary for the purposes set out in this notice, or as required by law. Our general retention principles are:

- Membership records — held for the duration of membership; deleted within 12 months of membership ending, so lapsed members can rejoin easily. Payment records are kept as financial records (below).
- Medical information — deleted when membership or volunteering ends.
- Safeguarding concern records — held in accordance with RFU safeguarding guidance; records relating to children are generally kept until the child reaches age 25.
- Financial records — kept for 6 years in accordance with HMRC requirements. Gift Aid declarations are kept for 6 years after the last donation claimed.
- Volunteer Form — held while you volunteer; enquiries that do not go ahead are deleted after 6 months.
- Volunteer Self-Declaration, references and recruitment records — deleted when you leave the role. We never keep copies of DBS certificates.
- EDI data — reviewed annually; anonymised data retained for trend reporting; individual identifiers removed once no longer required for membership purposes.
- CCTV footage — retained by Hackney Council in accordance with their own retention schedule. We have no access to this footage.
- Consent-based marketing data — held until consent is withdrawn.
- Injury and incident reports — kept for 3 years after the incident; for under-18s, until they reach 21.
- Injured Player membership evidence — deleted at the end of the season; we keep only the type of evidence.
- Senior Fellowship Fund and Bursary — decisions and payments are kept as financial records; supporting details are deleted once the application is decided.

When data is no longer required, it is securely deleted or anonymised.

7. Your Rights

Under UK data protection law, you have the following rights:

- Right of access — to obtain a copy of the personal data we hold about you (Subject Access Request).
- Right to rectification — to have inaccurate data corrected.
- Right to erasure — to have data deleted where there is no legitimate reason for us to continue holding it.
- Right to restriction — to ask us to limit how we use your data.
- Right to portability — to receive your data in a structured, machine-readable format.
- Right to object — to processing based on legitimate interests or for direct marketing.
- Right to withdraw consent — where processing is based on consent, you may withdraw it at any time without affecting the lawfulness of prior processing.

To exercise any of these rights, please contact our Data Officer (see Section 10). We will respond within one calendar month.

If you are unhappy with how we have handled your data, please contact us first so we can put it right. You also have the right to complain to the Information Commissioner's Office (ICO): ico.org.uk/make-a-complaint or 0303 123 1113.

8. Children's Data

We take the privacy of children particularly seriously. Where we collect data relating to junior members (under 18), this is provided by, and processed with the consent of, a parent or guardian.

Parents and guardians may request access to, or deletion of, data held about their child at any time. Once a junior member turns 18, they assume responsibility for their own data and can update their own preferences in Teamo.

We do not knowingly send marketing communications to anyone under the age of 18.

9. Changes to This Notice

We may update this Privacy Notice from time to time. The current version will always be available on our website at www.hackneyrfc.co.uk/policies-forms. We will notify members of significant changes by email or via the Teamo platform.

10. Contact Us

If you have any questions about this Privacy Notice, or wish to exercise your data rights, please contact:

Data Officer

Hackney Rugby Football Club Ltd, 75 De Beauvoir Road, London, N1 4EL

Email: data@hackneyrfc.co.uk

For safeguarding concerns, contact the Club Safeguarding Officer: safeguarding@hackneyrfc.co.uk

Related Policies

This Privacy Notice should be read alongside:

- Safeguarding Policy
- Code of Conduct
- Appropriate Policy Document (criminal records information)

All policies are available on request from the Data Officer and at www.hackneyrfc.co.uk/policies-forms