

CLUB INTERNACIONAL D'ANDORRA DATA PROTECTION POLICY

INTRODUCTION:

The Club is required under the terms of the Data Protection Act 29/2021 to maintain a data protection policy that covers all the personal data that may be obtained by the Club about members and which also protects members from each other when data is obtained “informally” (which includes photographs and sound recordings taken by members on their mobile phones when participating in any Club activity).

The Club obtains and maintains as little personal data about members as possible. The Membership Secretary maintains the membership records of the Club, which include full name, e mail address and possible interest in specified activity groups, as well as the bank account details required to direct debit annual subscriptions. This information is available only to the Membership Secretary. The membership list is registered with the data protection authorities.

The Club maintains a mailing list which contains only the names (as given by members) and e mails to be used by the Club in sending out information to members. This mailing list is maintained by the Membership Secretary and a second designated member of the Board and, although mailings may be prepared by other designated members, they do not have access to the underlying personal data of individual members. The mailing list is registered with the data protection authorities.

Activity Groups may maintain lists of members who have indicated interest in participating in the activity. In all cases these lists are limited to names (as given by members) and contact links (which may be e mail addresses or mobile phone numbers, depending on whether the lists are maintained on spreadsheets or as WhatsApp or Telegram or other social media groups for the activity). If maintained as spreadsheets, they are kept by the activity group leader and only contain data on members who have requested to be kept informed of activities; if maintained on social media groups then the member has direct control over whether they continue to form part of the group. Members leaving the Club have the responsibility for ensuring that they remove themselves from social media groups and to inform group leaders that they no longer wish to receive notifications of group activities.

CLUB POLICIES:

All personal data obtained by the Club is treated as strictly confidential. Contact data is not shared between groups without specific member permission. Contact data is not given out by the Membership Secretary or the designated member with access to the mailing list. No third party is allowed access to any data.

The Club Secretary is our Delegate for Data Protection and responsible for any contacts with the Data Protection Authority and for dealing with any matters raised by members regarding our policies or their implementation.

In order to obtain and retain membership of the Club it is required that all members have an entry in the membership records of the Club showing their name and a contact address, which is taken to be an e mail address. This is required by the Law of Associations, which also requires that all members are notified of such things as Annual General Meetings. Under the statutes of the Club such notifications are to be made by e mail, which is why an e mail address is required for each member.

Activity groups allow their members to take photos and make video recordings while the activities are taking place. Becoming and remaining a member of the Club and taking part in group activities implies acceptance of this policy. Wherever a formal photo or video is taken, an opportunity will be given to individual members to not take part. Photos or videos taken during Club activities may be used by the Club in presentations to third parties or in events such as the annual Fira d'Associacions without specific consent of members.

Paying and renewing membership fees is taken by the Club as acceptance by each member of these policies. Should any incident occur as a result of these policies then the member affected should initially contact the Secretary in their role as Delegate for Data Protection.

Date of approval of this policy: December 13, 2022