



Nunthorpe Squash Club Squash

Data Protection Impact Assessment (DPIA)

Date 1st Dec 2023

1. Assessment Details:

- **Assessment Name:** Nunthorpe Squash Club Data Processing Activities
- **Data Controller:** Nunthorpe Squash Club
- **Data Processor (Website Hosting):** Kualo

2. Data Processing Activities:

- **CCTV Usage:** Surveillance of club premises for security purposes.
- **Meeting Recordings:** Use of mobile phones to record meetings for minute-taking purposes.
- **Member's Database:** Storage of member names, email details, and contact details on a third-party hosted website.

3. Data Subjects:

- Club members (name, contact details)
- Members & Visitors to the club premises (CCTV footage)

4. Data Protection Risks:

- Unauthorized access to meeting recordings and member database.
- Inappropriate use of CCTV footage.
- Inadequate security measures leading to data breaches.
- Lack of clarity on data processing purposes and member consent.

5. Data Protection Measures:

5.1 CCTV Usage:

- Encrypt and secure CCTV footage.
- Limit access to authorized personnel.
- Clearly display notices indicating the presence of CCTV cameras and the purpose of processing.
- CCTV hard drives content overwritten every 30 days and securely stored with limited access to equipment.

5.2 Meeting Recordings:

- Inform participants before recording meetings.
- Store recordings securely, with restricted access.
- Implement procedures for obtaining consent for recording and storing meetings.
- Content destroyed securely after 4 weeks.

5.3 Member's Database:

- Ensure the third-party provider complies with GDPR regulations. - See relevant documentation
- Regularly update and verify member information. - conducted daily
- Obtain explicit consent from members for data processing activities as part of onboarding.

6. Legal Compliance:

- Ensure compliance with GDPR regulations.
- Clearly communicate data processing purposes and privacy policies to members.
- Implement data protection training for relevant personnel.

7. Data Minimization:

- Only collect and process data necessary for the intended purposes.
- Regularly review and delete unnecessary data.

8. Data Subject Rights:

- Establish procedures for data subject access requests.
- Provide clear information on how members can exercise their rights.

9. Documentation:

- Maintain records of data processing activities, risk assessments, and measures implemented.
- Review and update DPIA regularly.

10. Privacy Impact Assessment Outcome:

- Overall, the privacy risks associated with the identified data processing activities have been assessed and mitigated appropriately.
- Regular reviews and updates will be conducted to ensure ongoing compliance with data protection regulations.

11. Approval:

Geoff Smith – Chairman - On behalf of Nunthorpe Squash Club Management Committee

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