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**Millbrook F.C. GDPR Policy**

1. **Data Collection and Processing:**
   * Millbrook FC collects and processes personal data of its members, volunteers, and stakeholders solely for the purpose of managing club activities and communications.
   * Personal data will be collected lawfully, fairly, and transparently, and only for specified, explicit, and legitimate purposes.
2. **Data Security:**
   * Millbrook FC will implement appropriate technical and organisational measures to ensure the security of personal data, protecting it against unauthorized or unlawful processing and against accidental loss, destruction, or damage.
   * Access to personal data will be restricted to authorised personnel on a need-to-know basis, and all data processing activities will be documented and regularly reviewed for compliance.
3. **Data Retention and Disposal:**
   * Millbrook FC will retain personal data only for as long as necessary to fulfil the purposes for which it was collected, including legal, accounting, or reporting requirements.
   * Personal data that is no longer necessary will be securely disposed of in accordance with GDPR guidelines to prevent unauthorised access or disclosure.
4. **Data Subject Rights:**
   * Millbrook FC respects the rights of individuals regarding their personal data, including the right to access, rectify, erase, restrict processing, and data portability.
   * Requests from data subjects regarding their personal data will be promptly addressed, and appropriate measures will be taken to ensure compliance with GDPR requirements.
5. **Data Breach Notification:**
   * In the event of a personal data breach, Millbrook FC will promptly assess the risk to individuals’ rights and freedoms and, if necessary, report the breach to the appropriate supervisory authority and affected individuals in accordance with GDPR requirements.
6. **Data Protection Officer:**
   * Millbrook FC has appointed Richard Stapleton and Mark Puleo as Data Protection Officers (DPO) responsible for overseeing GDPR compliance, providing guidance on data protection practices, and serving as the point of contact for data subjects and supervisory authorities.
7. **Training and Awareness:**
   * Millbrook FC will provide regular training and awareness programs to all personnel involved in data processing activities to ensure understanding of their responsibilities and compliance with GDPR principles when requested.
8. **Review and Update:**
   * This GDPR policy will be reviewed and updated regularly to reflect changes in legal requirements, organizational practices, and technological advancements, ensuring ongoing compliance and effectiveness in protecting personal data.

By adhering to this GDPR policy, Millbrook FC is committed to safeguarding the privacy and rights of individuals in accordance with applicable data protection laws.

Updated 09/02/2024 – Richard Stapleton