



# Luctonians Sports Club

## General Data Protection Regulations

### Electronic Communications

Luctonians Sports Club Ltd and Luctonians Ltd (the Club) recognise that the use of electronic communication is embedded in modern society and a necessity to a successful communications policy.

The Club also recognises that, as well as the use of emails, communications strategies must also include the use of websites and other social media platforms. All these communications must comply with the Policy on Websites, Social Media Platform the taking and storing of Images and Videography.

Email communication is a primary source of communication and it is recognised that personal data is more than likely present in every email that is generated. In the simplest way this could be the email addresses of the sender and recipient or other such details that might be attached, such as signatures. However, it must be recognised that whenever an email is sent to a third party this is likely also to be sharing personal information.

There is some cross-over between personal information and corporate information when considering email addresses depending on the way the email address is composed. Therefore, it is easier if all emails are dealt with in the same way to avoid confusion. Emails are used to communicate information both externally and internally and again this should make no difference and the same standards should be applied.

**The Club expects the composition of all emails that are sent on its behalf, as a consequence of carrying out a role within the Club (paid or volunteer) should be so composed that the information and subject matter contained within the email is relevant to its subject and reason for being written, contains appropriate language, does not belittle, embarrass or insult any third party or bring the Club or any member of the Club into disrepute.**

#### **Sending Emails**

When sending out emails the following should be considered:

Send only to those persons who need the information contained.

If the email is being sent to more than once person consider the nature of the email, is it necessary to send that information to them? Consider their email addresses and if the third parties are likely not to be known to each other, distribute by using the function of Blind Carbon Copy (BCC) so others' personal email addresses are not shared so keeping their privacy intact.

When sending out multiple emails, such as new letters or generic communication to all members, ensure that the members you are emailing have granted their permission to be so contacted. When sending out such multiple addressed emails this should be done in such a way that no person's email is exposed, ie BCC.

When sending out multiple addressed emails, make sure that any personal information contained within the email is in keeping with all other policies on the protection of personal information. For example, to list the names of try scorers in a game or a cricket score card have all the individuals agreed to their personal details being so used.

If sending out any email to an individual or a small group that contains sensitive information that the individual considers or would consider sensitive or special category data then this data should be contained in a separate attached document that has a high encryption level. The encryption key should be sent at a different time in another separate email or preferably using an alternative method of communication.

#### **Receiving Emails:**

When receiving emails consider the contents and decided whether the information contained within the email contains Personal Information or Special Category Information. If yes decided how you are going to deal with this information and protect it, and if it requires sharing do you have an authority to share.

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# Luctonians Sports Club

If the email contains personal information that requires updating of Club records, update the records and then delete the email.

If the email contains personal information that need to be referred to a third party for action, consider how the email is sent (see above).

Never open an email attachment unless you are sure of its validity. Many electronic viruses are maliciously spread through such attachments.

## **Retention of Emails**

The Club accepts that people do keep a lot of emails as a matter of course, however we would urge good email management and to keep only those emails that are critical to your role within the Club. Also consider if the email contains information that should be stored elsewhere. If so, once the information has been stored delete the email. This is a must when updating personal information or special category data.

The Club has no set policy on the storage of emails, however it would urge that each person who operates @luctonians email account to self-audit emails every 12 months.

Those who receive email to a personal email address as a result of having a role within the club membership should similarly consider their requirement to retain emails. Once they have dealt with any personal information the email should be deleted and likewise they should have a self-audit every 12 months.

## **Email Security**

Make sure that your computer or other electronic device has suitable anti-virus software installed and operation for both incoming and outgoing communications.

Make sure your passwords that protect your device and email account are suitably strong (8 plus characters 1 upper case letter, 1 lower case letter, 1 numeric character and 1 special character).

Make sure your passwords are unique to, not written down or shared with anyone else.

## **Think before you post**

If you forward an email, do you have the lawful authority to share any personal data contained within it? Is it safe to forward it?

**This policy should be read in conjunction with other Data Protection Policies of the Club.**

**Any questions about this Policy should be directed to the Club's Data Protection Officer: [dpo@luctonians.co.uk](mailto:dpo@luctonians.co.uk)**

Last Reviewed on 19<sup>th</sup> April 2021