



Fakenham Angling Club 2026 Data Protection & GDPR Policy (UK GDPR & Data Protection Act 2018)

1. Introduction

Fakenham Angling Club ("the Club") is committed to protecting the privacy and personal data of all members, volunteers, junior participants and other individuals interacting with the Club.

This policy explains how the Club collects, uses, stores, shares and protects personal information in accordance with the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018 and other applicable data protection legislation.

For the purposes of data protection law, Fakenham Angling Club is the Data Controller. The Committee appoints a GDPR/Data Protection Officer to oversee compliance with this policy.

The Club will only collect and use personal information where there is an appropriate lawful basis and will ensure, as far as reasonably practicable, that personal information is adequate, relevant and limited to what is necessary for the purpose for which it is being processed.

2. What Personal Data We Collect

The Club only collects personal data that is necessary for running the Club safely and effectively. This may include:

Membership Data

Membership information is primarily managed through the Club's Clubmate membership system and may include:

- Full name and contact details, including home address, telephone number and email address.
- Date of birth and membership category.
- Membership number and membership status.
- Emergency contact details, where provided.
- Payment and transaction records.
- A current membership profile photograph used for identification and membership verification.

Payment card details are processed by the relevant payment provider and are not stored directly by the Club.

Angling and Activity Records

- Permit and day-ticket records.
- Competition entries and results, where applicable.
- Incident, accident and near-miss records.
- Information relating to breaches of Club rules, complaints or disciplinary matters.
- Clubmate bankside check-in records created by authorised Club bailiffs.

A bankside check-in may record that a member or ticket holder was present and fishing on Club waters at the time of a bailiff check. These records may also assist the Club in understanding general levels of use across its waters and help inform future water management and Club decisions.

Safeguarding Information

- Junior membership information.
- Parent or guardian details and relevant consent forms.
- Safeguarding concerns and incident records.

Safeguarding information will be treated as confidential and access will be appropriately restricted.

Committee, Bailiff and Volunteer Information

- Contact details.
- Role descriptions and responsibilities.
- Relevant qualifications or training, for example first aid, coaching or equipment-related qualifications.
- DBS information where required for safeguarding purposes.

3. How Personal Data Is Collected

Personal information may be collected through:

- Membership applications and renewals through Clubmate.
- Information entered or updated by members through their Clubmate account.
- Membership profile photographs uploaded by members.
- Information or photographs supplied directly by members to authorised Club officials.
- Bankside membership and ticket checks carried out by authorised Club bailiffs.
- Clubmate bankside check-ins.
- Emails, Clubmate messages, letters or other correspondence sent to the Club.
- Accident, incident and near-miss reports.
- Complaints or disciplinary matters.
- Safeguarding reports or welfare concerns.
- Event, work-party or junior-day records.
- Competition or match entries.
- Day-ticket sales and visitor records.

An authorised Club official may assist a member with updating their Clubmate information or membership photograph where appropriate.

Where information is obtained from another source rather than directly from the individual, the Club will ensure that its collection and use is lawful, fair and transparent and will provide appropriate information about the source and intended use where required.

4. Legal Bases for Processing Personal Data

The Club will identify an appropriate lawful basis for processing personal information. Depending upon the purpose and circumstances, these may include:

- Contract – where processing is necessary to administer membership, day tickets, payments and access to Club waters and facilities.
- Legal obligation – where processing is necessary for the Club to comply with a legal requirement.
- Legitimate interests – where processing is necessary for the legitimate interests of the Club or another person and those interests are not overridden by the rights and freedoms of the individual.

- Consent – where appropriate for specific optional activities or uses of personal information, including certain uses of photographs and media.

Legitimate interests may include effective Club administration, membership administration and verification, managing access to Club waters, maintaining safety, protecting Club property, protecting fish welfare and the environment, managing and understanding the use of Club waters, and communicating appropriate Club information to members.

Where the Club relies upon legitimate interests, it will consider whether the processing is necessary and proportionate and balance the Club's interests against the rights and freedoms of the individual.

Where information requiring additional legal protection is processed, the Club will ensure that any additional requirements under data protection law are met.

5. How We Use Personal Data

Personal information may be used for:

- Administering memberships, renewals and day tickets.
- Verifying the identity of members and ticket holders and confirming their entitlement to fish Club waters.
- Using membership profile photographs to assist authorised bailiffs and Club officials with membership identification and verification.
- Carrying out bankside membership and ticket checks and recording Clubmate bankside check-ins following checks by authorised bailiffs.
- Understanding general levels of use across Club waters and assisting with management and future planning.
- Communicating important Club information, including closures, rule changes, meetings, safety information and events.
- Managing incidents, accidents, insurance matters, complaints and disciplinary matters.
- Safeguarding junior members and other individuals where appropriate.
- Protecting fish welfare and the environment.
- Managing competitions, matches, work parties, events and junior activities where applicable.
- Meeting the Club's legal, financial and accounting obligations.

The Club does not sell personal information and will not provide members' personal information to third parties for their own marketing purposes.

6. Clubmate Membership System

Clubmate is the Club's official membership management system. The Club uses Clubmate to assist with membership applications and renewals, membership administration and status, membership profile photographs, payment and transaction records, membership identification and bankside verification, day tickets where applicable, bankside check-ins carried out by authorised Club bailiffs, and communications or other membership-management functions where applicable.

Members should ensure that the personal information held within their Clubmate account is accurate and notify the Club or update their account where information changes.

Where the Club requires a membership profile photograph, members must provide a suitable, current photograph that allows them to be readily identified.

Membership profile photographs are collected and used for membership identification and verification. They are not treated as consent for the Club to use that photograph for publicity, social media or promotional purposes.

Authorised Club officials may assist members in updating information or uploading a suitable membership photograph where appropriate.

Access to Clubmate administrative functions is restricted to authorised Club officials according to their role and the information they reasonably require. Payment card details are handled through the relevant payment-processing arrangements and are not stored directly by the Club.

7. Bankside Checks and Check-In Records

Authorised Club bailiffs may use Clubmate when carrying out membership or ticket checks on Club waters. As part of a bankside check, a bailiff may:

- Verify membership or ticket status.
- View information reasonably necessary to identify the individual, including their membership profile photograph.
- Confirm the individual's entitlement to fish.
- Record a bankside check-in using Clubmate.

Members do not use the Clubmate bankside check-in function themselves. Check-ins are created by authorised Club bailiffs as part of their duties.

Bankside check-in information may be used to maintain an appropriate record of bankside membership checks, assist with membership administration, help understand general levels of use across Club waters, and assist with future water management and Club planning.

Identifiable bankside check-in information will normally be retained for no longer than the Club's standard 12-month routine-data retention period. The Club may retain anonymised statistical information derived from check-in records for longer-term analysis where individuals can no longer be identified from that information.

8. Who Has Access to Personal Data?

Access to personal information is limited to authorised Club officials who require it to perform their role. This may include:

- Chairman and Vice Chairman – for overall Club management and serious incident oversight.
- Secretary – for administration, communications and record keeping.
- Treasurer – for financial and membership-payment records.
- GDPR/Data Protection Officer – for data-protection compliance, requests and oversight.
- Designated Safeguarding Officer – for safeguarding-related information where appropriate.
- Membership administrators – for membership administration and processing.
- Bailiffs – limited access to information necessary to verify membership or ticket status, identify individuals, confirm entitlement to fish and perform authorised bankside checks.

Committee members, bailiffs and volunteers do not automatically have general access to members' personal information. Access will be limited to the minimum information reasonably necessary for the individual's role.

9. Data Sharing

The Club does not sell personal information or share it with third parties for their own marketing purposes. Personal information may be shared where necessary and lawful, including with:

- Organisations providing services to the Club, including Clubmate and relevant payment-processing providers.
- Police or other law-enforcement agencies where required or permitted by law.
- The Angling Trust or appropriate safeguarding organisations where necessary in relation to safeguarding.

- Insurance providers or legal advisers in relation to claims, incidents or legal matters.
- Emergency services where necessary following an emergency or incident.
- Regulatory or other competent authorities where the Club has a lawful reason or obligation to provide information.

Where another organisation processes personal information on behalf of the Club, the Club will take reasonable steps to ensure appropriate data-protection arrangements are in place.

10. Data Storage and Security

The Club will take appropriate measures to protect personal information from loss, misuse, unauthorised access, alteration or disclosure. Measures may include:

- Digital records being stored on appropriately secured systems, including Clubmate and official Club email accounts.
- Access being restricted to authorised individuals and appropriate passwords and account security being used.
- Paper records containing personal information being stored securely.
- Safeguarding information being held separately and confidentially with restricted access.
- Personal information not being routinely stored on personal devices; where this is necessary for legitimate Club purposes, appropriate security measures must be used.
- Secure backups being maintained where appropriate.
- Personal information being securely deleted or destroyed when no longer required.

11. Data Retention

The Club will not retain identifiable personal information for longer than reasonably necessary for the purpose for which it was collected.

Routine Membership and Activity Information

The following will normally be retained for up to 12 months following the end of the relevant membership or activity period:

- Membership information and expired membership records.
- Membership profile photographs.
- Clubmate bankside check-in records.
- Day-ticket records and routine visitor records.
- Other routine membership-administration information.

The Club will undertake an annual review and clean-up of routine personal information before the start of each new membership renewal period.

Where historical information about the use of Club waters is useful for planning or management purposes, the Club may retain anonymised statistical information after the identifiable records have been deleted or anonymised.

Records Requiring Longer Retention

Certain information may need to be retained for longer than 12 months because of its nature or because of legal, financial, insurance, safeguarding or other requirements. This may include:

- Financial and accounting records.
- Accident and incident reports.
- Insurance records and claims.
- Safeguarding information.
- Complaints and disciplinary records.
- Information connected with an ongoing dispute, investigation or legal matter.

Such information will only be retained for as long as reasonably necessary for the relevant purpose or as required by applicable law, regulation, insurance requirements or appropriate guidance.

When personal information is no longer required, it will be securely deleted, destroyed or anonymised as appropriate.

12. Photographs and Media

There is an important distinction between membership identification photographs and photographs used for publicity or media purposes.

Membership Identification Photographs

A membership profile photograph held through Clubmate is used for membership administration, identification and verification. Providing a membership photograph does not constitute permission for the Club to use that photograph on social media, the Club website, advertising or other publicity material.

Publicity, Social Media and Other Photographs

Photographs or videos of identifiable individuals may be taken or used for Club publicity, social media, the Club website, event coverage or other Club communications where the Club has an appropriate lawful basis to do so.

- Where the Club relies upon consent, the individual will be informed of the intended use.
- Appropriate parent or guardian consent will be obtained where required for junior participants.
- Where processing relies upon consent, consent may be withdrawn for future use at any time.
- The Club will take particular care when publishing photographs or information involving junior members.

13. Accuracy of Information and Member Responsibilities

The Club will take reasonable steps to ensure personal information is accurate and kept up to date where necessary.

Members are responsible for providing accurate information when applying for or renewing membership and are encouraged to keep the information within their Clubmate account current.

Members should update their Clubmate information or notify the Club where relevant information changes. Where a membership profile photograph is required, the member is responsible for providing a suitable current photograph that allows them to be readily identified.

Where necessary, an authorised Club official may assist a member with updating their information.

14. Individual Rights Under UK GDPR

Individuals have rights regarding their personal information under UK data-protection legislation. Depending upon the circumstances, these may include:

- The right to be informed about how personal information is used.
- The right to request access to personal information held about them.
- The right to have inaccurate information corrected.
- The right to request deletion of information in certain circumstances.
- The right to request restriction of processing in certain circumstances.
- The right to object to certain processing.
- The right to data portability where applicable.
- The right to withdraw consent where processing relies upon consent.

These rights are not absolute and their application may depend upon the circumstances and the lawful basis upon which information is being processed.

Requests to exercise data-protection rights should be made to the Club via chairman@fakenhamanglingclub.com. The Club will respond within the timescale required by applicable data-protection legislation, normally within one calendar month.

Individuals also have the right to raise concerns about the Club's handling of their personal information with the Information Commissioner's Office (ICO).

15. Personal Data Breaches

A personal data breach may include loss or theft of personal information, unauthorised access, accidental disclosure, inappropriate alteration or destruction, or loss of access where this creates a risk to individuals.

Any suspected personal data breach involving Club information must be reported immediately to the Chairman and GDPR/Data Protection Officer.

The Club will investigate the circumstances and assess the potential risk to affected individuals.

Where the legal threshold for reporting is met, the Club will notify the Information Commissioner's Office without undue delay and, where required, within 72 hours of becoming aware of the breach.

Where legally required or otherwise appropriate, affected individuals will also be informed.

16. Review of This Policy

This policy will normally be reviewed by the Committee at the Club's Annual General Meeting.

It may be reviewed earlier where necessary because of changes in data-protection legislation or regulatory guidance, significant changes to Club systems or technology, changes to Clubmate or another service used by the Club, changes to the way the Club collects, uses, stores or shares personal information, or a significant data-protection incident or concern.

An interim review or amendment does not alter the Club's normal AGM policy-review cycle unless determined otherwise by the Committee.

17. Contact and Data Requests

Questions regarding this policy, the Club's handling of personal information, or requests to exercise data-protection rights should be directed to the Club via:

Email: chairman@fakenhamanglingclub.com

Requests will be passed to or dealt with by the appropriate Club officer as necessary.

Where appropriate, individuals may also raise concerns with the Information Commissioner's Office (ICO).

Reviewed by: Daniel Rowe

Reviewed on: 4 September 2026

Next review date: AGM – February 2027