**GDPR Policy**

**MKMA** **Karate** **Whistle** **Blowing**

**Policy** **and** **Procedures**

Master Kindred Martial Arts (MKMA Karate)

Written: 26th July 2021

 Review Date: July 2026

To Be Reviewed with Intervals No Greater Than 2 Years

**Reviewed last**: 30/07/2024

**Reviewed By:** J. Rowberry

**Signature:**

**Terminology**:

**GDPR** – The General Data Protection Regulation

**EU** – European Union

**MKMA** **Karate** – Master Kindred Martial Arts/MKMA Karate/MKMA Club

**Member** – An individual who holds a membership with MKMA Karate (where a member is under 18, their legal parent guardian is included under this term)

**Staff** – This includes instructors and other members of the MKMA Karate Management team including administrators etc.

**Client –** A student or Parent or other who is paying for or using classes/services offered by MKMA Karate

**Dojang** – Training Hall / Training Location

**OCM** – Online Club Manager, Software used to maintain personal details of members from 2020 to January 2024

* Below is a link to the OCM Security and GDPR acknowledgements
* <https://www.onlineclubmanager.com/security.html>

**Article** **89** (1) – Referring to Article 89 section 1 of the GDPR regulations 2018.

**Wix** – Online base website software used to build the original MKMA Karate website, online members area and shop, now superseded by the BMABA WordPress website

**BMABA** – The British Martial Arts and Boxing association

**Club Manager** – Software used to maintain personal details of members as well as records of insurance

**Admin Portal** - The Administrator facing side of the Club Manager CRM provided by BMABA

**Student Portal** – The student facing side of the Club Manager CRM provided by BMABA

**WordPress** – The software used by BMABA to Host [www.mkmakarate.co.uk](http://www.mkmakarate.co.uk)

**Introduction**

The General Data Protection Regulations (GDPR)(an EU Directive) have been put into place in order to protect your personal data and privacy.

MKMA Karate are committed to protecting the privacy of our members. This GDPR Policy is intended to outline to our members how we gather, define and utilise information. It applies to information collected by us whether at one of our dojangs, through our website, through Club Manager, BMABA, OCM or in any other way (such as over the telephone). It is also intended to assist members in making informed decisions when using our website and/or services.

MKMA Karate is the controller of the personal information provided by our members and staff for the purposes of the GDPR.

In summary, the MKMA Karate GDPR policy states that for all our current members and/or potential members, the clubs will:

- Securely keep all relevant contact details of students and/or their parents/guardians, schools/venues and staff.

- Never sell data or mailing lists to 3rd parties.

- Use data only to relay club related information, updates and reports as well as for invoicing purposes.

Information on our website and/or social media has either been supplied by the owner with a request to publish or is information already in the public domain.

**The 6 Principles of GDPR**

**Article 5 - Principles relating to processing of personal data**

Personal data shall be:

1. Processed lawfully, fairly and in a transparent manner in relation to the data subject (‘lawfulness, fairness and transparency’);
2. Collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall, in accordance with [Article 89](https://gdpr-info.eu/art-89-gdpr/)(1), not be considered to be incompatible with the initial purposes (‘purpose limitation’);
3. Adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed (‘data minimisation’);
4. Accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay (‘accuracy’);
5. Kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes in accordance with [Article 89(](https://gdpr-info.eu/art-89-gdpr/)1) subject to implementation of the appropriate technical and organisational measures required by this Regulation in order to safeguard the rights and freedoms of the data subject (‘storage limitation’);
6. Processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures (‘integrity and confidentiality’).

Ref. <https://gdpr-info.eu/art-5-gdpr/>

**What data do we store?**

- Current members and/or potential members relevant information such as full name, date of birth (age), full name of parent or guardian, email, phone number, home address, grade, dates of events such as gradings, school/dojang/venue phone number and address as well as name of personal contacts at these venues, staff phone number and home address as well as email.

- Certificate registration numbers (linked to membership number only)

- Notes of conversations via email (email communications) or phone/messages/whats app communication.

- Any correspondence relating to MKMA Karate, between “the clubs”, members and staff

- Recording attendance

- Please note: MKMA Karate DO NOT store payment details of clients such as card or bank details.

**How we use information held**

We will hold, use and disclose member information for legitimate purposes including:

* To relay club related information and marketing, updates and reports as well as for invoicing purposes.
* To keep clients up to date with important changes to MKMA Karate.
* To administer and provide products and services members request or have an interest in.
* To communicate with members in the event that any products or services requested are unavailable.
* To answer member/parent or staff queries
* Communication with staff
* For record keeping purposes (e.g. grading dates, grades held, attendance at seminars)
* To release information to regulatory or law enforcement agencies if we are required to do so.
* To release to health care professionals such as ambulance crew and A&E doctors/nurses in the event you are injured, and you cannot speak for yourself/we cannot contact your next of Kin (emergency contact).

\*We may process certain sensitive personal data (known as special category data in the GDPR) where clients include it in information they send to us e.g. if information is included about your/your child(ren)’s health/medical history in booking/enrolment requests

**The legal basis for processing personal data**

Under GDPR, the main grounds that we rely upon in order to process personal data are the following:

* Necessary for compliance with a legal obligation – We as an organisation/club are subject to certain legal requirements which may require us to process client information. We may also be obliged by law to disclose client information to a regulatory body or law enforcement agency.
* Necessary for the purposes of legitimate interests – We will need to process Member data for the purposes of our legitimate interests.

\*Legitimate interests include responding to requests and enquiries from clients, fulfilling enrolment/bookings, optimising our website and clients’ experience, informing clients about our products and services and ensuring that our operations are conducted in an appropriate and efficient manner.

**How we may share data:**

In Certain circumstances there may be a need to share data with other parties. Details of these parties are set out below along with the reasons for sharing it:

- Trusted third parties: In order to provide certain services, there will be the need to share data with third party service providers such as IT infrastructure companies and email logistics providers. We will not share data with any third party where it is not necessary to do so to provide a service to our members; nor will we ever sell data.

- Regulatory and law enforcement agencies. As noted above, if we receive a request from a regulatory body or law enforcement agency and if permitted under GDPR and other laws we may disclose certain personal data for the protection of our members.

- Medical Services. In the event a member becomes unwell/injured and they are unable to communicate information such as allergies and medical conditions, and where their emergency contact cannot be contacted or contacting them would delay lifesaving interventions MKMA Karate instructors may share relevant information as requested by services such as Ambulance/A&E staff.

\*Where the emergency contact has not initially been contacted, they should be contacted at the earliest opportunity and updated on the situation.

**Can I Access My Recorded data?**

To ensure full transparency, all members/students/parents/guardians have access to most if not all of their own personal data through digital means through the Student portal accessible through the club website.

Where data has been submitted to MKMA in alternative means such as email or paper, unless permission is withheld, this will either be uploaded to the student portal(if relevant), added to the website (If relevant), or stored in a secure locked file system and kept as long as necessary. To request access to this data, the individual should contact the MKMA Admin team. Individuals may only access their own information and will be requested to provide proof of identity.

Through the Student Portal System, members are required to ensure the data they submit is complete and up to date. Members will be reminded at regular intervals such as before gradings to log on and check the details held and edit if required.

Any issues in accuracy of information should be directed to the MKMA admin team if you are unable to edit yourself (such as information submitted on a paper form).

**Data Retention**

We will only hold member or staff data for as long as is necessary for the purpose(s) for which we have collected it.

Retention is based on how we use the information provided, for example, if we receive the data though an enrolment entry, we will retain this data for as long as a member remains with us. If we receive data for instructor applications, we will retain data for as long as is necessary to process the application and maintain instructor status.

In certain circumstances, once we have deleted or anonymised client/applicant data, we many need to retain parts of it for example an email address, in order to comply with our obligations under the GDPR or other legislation, or for fraud detection purposes.

In the event a student/member/instructor leaves MKMA Karate for legal reasons, MKMA Karate may hold personal data for longer than normal to share with appropriate agencies such as police.

All hard copy data will be destroyed by shredding and soft copies permanently deleted.

When deleting details from the Student Portal, the student additional data will be removed but core details including name and contact numbers will be retained for one year after leaving in case these are required for lawful purposes. After this time all details will be removed.

**Right to Erasure**

In certain circumstances the member has the right to request that the data we hold about them is erased e.g. If the data is no longer necessary for the purposes for which it was collected or processed.

Agreement to hold data/right to object or cancel:

If members do not wish personal data that we hold about them to be disclosed or used in the way that is set out in this policy and code of practice, please discuss the matter with the MKMA Karate Administration team. Members have the right to object or withdraw their consent, however this may affect our ability to provide the member with the best service.

Clients may withdraw their consent at any time by emailing mkmakarate@gmail.com. MKMA Karate may reject the request of erasure if the information is required by local authorities/law enforcement.

**Where Will My Data Be Stored**

MKMA Karate uses the following software to store information.

**BMABA** – students have basic details registered with the BMABA so that they may be registered onto the Lifetime Student Grade Register. Additionally, this registration with the BMABA provides student insurance.

**Club Manger** – Club manager is provided by BMABA and is a plug in to the club WordPress website hosted by BMABA. All key student information is securely stored on this system.

**Password protected computers** utilising Microsofts One Drive cloud-based system, owned by Miss Sarah Martin & Mr Karl Kindred located at: 2, Cadle Pool Farm Cottages, The Ridgeway, Stratford Upon Avon, CV37 9RE.

**Password protected computer** utilising Microsofts One Drive cloud-based system, owned by MR James Rowberry located at 2 Geeson Road, Drakes Broughton, Pershore, WR10 2GX

**Lockable Storage box** located at: 2, Cadle Pool Farm Cottages, The Ridgeway, Stratford Upon Avon, CV37 9R

The below systems were utilised between the years of 2020-2024. Once all data is migrated, all other data will be deleted by March 2025.

**Wix** – Website system – Stores basic information online for the purposes of access to the member features of the site

**OCM** – Online Club Manager – Stores detailed information online in the secure services used by the OCM company.

**Who Can Access my Data?**

The following people are permitted to full access of the data you submit in accordance with this policy.

**Mr James Rowberry**

MKMA Karate Chief Administrator (3rd Dan Black Belt)

Designated Safeguarding Lead & Club Welfare Officer

Email: Jrrowberry@yahoo.co.uk

Phone:07483834447

**Mr Karl Kindred**

MKMA Karate Chief Instructor (6th Dan Master Grade)

Deputy Safeguarding Lead

Email: kilakindred@gmail.com

Phone: 07776192663

**Miss Sarah Martin**

MKMA Karate Assistant Chief Instructor (4th Dan Master Grade)

Email: sarah-martin6@sky.com

Phone: 07734810941

------------ *No other individual is authorised to access your data past this line* ------------