*This is an example of a completed privacy notice using a hypothetical sports club based on our template. It is for reference only and not to be used for clubs’ privacy notices.*

# Clubs template privacy notice – members' example

# Scotland Sports Club Privacy Notice

We take your privacy very seriously. Please read this privacy notice carefully as it contains important information on who we are and how and why we collect, store, use and share your personal information. It also explains your rights in relation to your personal information and how to contact us or supervisory authorities in the event you have a complaint.

Our contact details:

Name – Scotland Sports Club

Address – 1 Scotland Street, Scotland, SC01 4ND

Phone number – 0123 456 789

Email – hello@scotlandsportsclub.co.uk

Scotland Sports Club will be a "controller" of the personal information that you provide to us in this form, unless otherwise stated.

## What we collect / need

When you register as a member of Scotland Sports Club or renew your membership (including if you are registering or renewing on behalf of a child under the age of 18), we will ask you for the following personal information:

* contact details – name, address, email address, and date of birth;
* membership criteria / category – athlete, parent, volunteer; and
* equality information – disability (if any), ethnic group, religious belief, gender identity and sexual orientation.

When you volunteer with Scotland Sports Club, we will ask you for the following personal information:

* contact details – name, address, email address, and date of birth;
* participation details – qualifications; and
* PVG membership, including certificates and searches.

## How your personal information is collected

Most of the personal information we process is provided to us directly by you when you become a member. We may also receive your personal information indirectly, including from the following sources:

* other members in relation to your engagement with them, such as participating in events, meetings, competitions and training camps, where a complaint is raised involving you as a witness or otherwise, where a disciplinary or safeguarding matter is being investigated;
* if a member of the public contacts Scotland Sports Club regarding any matter involving you;
* from our sports governing body, Scotland SGB;
* from official authorities, including Police Scotland, the UK Anti-Doping Agency or Disclosure Scotland; or
* from your legal representatives.

## How and why we use your personal information

Under data protection law, we can only use your personal information if we have a proper reason for doing so, for example:

* to comply with our legal and regulatory obligations;
* for the performance of our contract with you or to take steps at your request before entering into a contract;
* to protect your vital interests;
* to exercise a public function or perform a task in the public interest set out in law;
* for our legitimate interests or those of a third party; or
* where you have given consent.

We need to collect our members' personal information so that we can manage your membership. We will use our members' personal information to:

* provide you with core member services, including, insurance, licensing and PVG checks; and
* send you membership communications by post or email in relation to essential membership services, including but not limited to, membership renewals and information on membership benefits.

If you do not provide us with all of the personal information that we need to collect then this may affect our ability to offer the above membership services and benefits.

We are under a legal obligation to process certain personal information relating our members, volunteers, participants and athletes for the purposes of complying with our obligations under:

* the Charities and Trustee Development (Scotland) Act 2005 to maintain a register of our members, which includes our members’ name, address, the date they were admitted to membership and the date on which they ceased to be our member, and hold general meetings, including issuing notices and voting arrangements;
* the Protection of Vulnerable Groups (Scotland) Act 2007 to check that our coaches and volunteers are able to undertake regulated work with children and vulnerable adults; and
* the Equality Act 2010, which requires us to process personal information to make reasonable adjustments where necessary.

We may also be required to process certain personal information to perform a task in the public interest, which may include details of athletes’ compliance with our anti-doping rules.

Where we process your personal information to perform a task in the public interest, you have the right to object to us using your personal information for the above purposes. If you wish to object to any of the above processing, please contact us on DP@ScotlandSportsClub.co.uk. If we agree and comply with your objection, this may affect our ability to undertake the tasks above for the benefit of you as a member.

We also process our members' personal information in pursuit of our legitimate interests to:

* promote and encourage participation in the sport of Scotland by sending members' communications and booking information for upcoming competitions and events. Our competitions and events may be filmed or photographed and your personal information may also be used in images captured from our competitions and events, which we use for promotional, education and development purposes;
* provide competition in the sport of Scotland by accepting and managing entries for our competitions and checking your personal information to ensure you are entered into the correct category;
* develop and maintain our members' qualifications, including sending email communications to members to inform you of upcoming courses, renewal requirements and verify that you have completed any mandatory training and PVG / child protection requirements; and
* respond to and communicate with members regarding your questions, comments, support needs or complaints, concerns or allegations in relation to the sport of Scotland. We will use your personal information to investigate your complaint, to suspend membership and take disciplinary action where appropriate.

Where we process your personal information in pursuit of our legitimate interests, you have the right to object to us using your personal information for the above purposes. If you wish to object to any of the above processing, please contact us on DP@ScotlandSportsClub.co.uk. If we agree and comply with your objection, this may affect our ability to undertake the tasks above for the benefit of you as a member.

## Other uses of your personal information

We may ask you if we can process your personal information for additional purposes. Where we do so, we will provide you with an additional privacy notice with information on how we will use your information for these additional purposes.

## Who we share your personal information with

If your personal information is included in any images or videos taken by us at our competitions and events, we may share this with Scotland SGB for promotional and/or journalistic purposes.

We may be required to share personal information with statutory or regulatory authorities and organisations to comply with statutory obligations. Such organisations include the Health & Safety Executive, Disclosure Scotland, and Police Scotland for the purposes of safeguarding children, disciplinary matters and investigations.

For the purposes of ensuring that our sport operates in a safe environment, the sharing of personal information with individuals and advisers may also be required in the event that we receive complaints and concerns and are required to investigate matters, particularly those involving disciplinary, anti-doping and safeguarding concerns.

We may also share personal information with our professional and legal advisers for the purposes of taking advice.

As an affiliated club of Scotland SGB we are required to ensure that all of our members are members of Scotland SGB as a condition of affiliation. We will share your name and membership category with Scotland SGB who will become a controller of your personal information when they receive it. Scotland SGB's privacy notice explains how they use your personal information and can be accessed here [www.ScotlandSGB.org.uk/privacynotice](http://www.ScotlandSGB.org.uk/privacynotice).

In the event that we do share personal information with external third parties, we will only share such personal information strictly required for the specific purposes and take reasonable steps to ensure that recipients shall only process the disclosed personal information in accordance with those purposes.

We publish the results of our competitions on our website. This includes competitors’ name, age and result.

We may also be required to share personal information relating to athletes’ health in order to undertake activities to eliminate doping, at a sporting event, within our sport generally, or to provide information about doping, or suspected doping, to UK Anti-Doping or another body with responsibility for eliminating doping in our sport.

## How we protect your personal information

Your personal information is stored on our electronic filing system and our servers based in the UK, and is accessed by our staff and volunteers for the purposes set out above.

We have appropriate security measures to prevent personal information from being accidentally lost, or used or accessed unlawfully. We limit access to your personal information to those who have a genuine need to access it. Those processing your personal information will do so only in an authorised manner and are subject to a duty of confidentiality.

We also have procedures to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

## Transferring your personal information out of the UK

Countries outside the UK have differing data protection laws, some of which may provide lower levels of protection of privacy. It is sometimes necessary for us to transfer your personal information outside the UK. In those cases, we will comply with applicable UK laws designed to ensure the privacy of your personal information.

We will transfer your personal information to:

* our service providers located outside the UK in France; and
* event / competition / training camp organisers or associated service providers.

Under data protection laws, we can only transfer your personal information to a country outside the UK where:

* in the case of transfers subject to UK data protection law, the UK government has decided the particular country ensures an adequate level of protection of personal data (known as an ‘adequacy regulation’) further to Article 45 of the UK GDPR. A list of countries the UK currently has adequacy regulations in relation to is available here. We rely on adequacy regulations for transfers to the following countries: countries in the EEA, including France;
* there are appropriate safeguards in place, together with enforceable rights and effective legal remedies for you; or
* a specific exception applies under relevant data protection law.

Where we transfer your personal information outside the UK, we do so on the basis of an adequacy regulation or (where this is not available) legally-approved standard data protection clauses recognised or issued further to Article 46(2) of the UK GDPR. In the event we cannot or choose not to continue to rely on either of those mechanisms at any time, we will not transfer your personal information outside the UK unless we can do so on the basis of an alternative mechanism or exception provided by UK data protection law and reflected in an update to this privacy notice.

Any changes to the destinations to which we send personal information or in the transfer mechanisms we rely on to transfer personal information internationally will be notified to you.

If you would like further information about personal information transferred outside the UK, please contact DP@ScotlandSportsClub.co.uk.

## How long we keep your personal information

We will only keep your personal information while you are a member, volunteer and/or athlete. Thereafter, we will keep your personal information for as long as is necessary to:

* respond to any questions, complaints or claims made by you or on your behalf;
* show you that we treated you fairly;
* keep records required by law.

Please note that in order to comply with UK Anti-Doping Rules, your personal information will be kept for a minimum of 12 months from the date of your membership, licence or competition.

When it is no longer necessary to retain your personal information, we will delete or anonymise it.

We have a data retention policy that sets out the periods for retaining and reviewing all information that we hold. This sets out different retention periods and you can request a copy by contacting us at DP@ScotlandSportsClub.co.uk.

## Your rights

You can exercise any of the following rights by writing to us at DP@ScotlandSportsClub.co.uk.

Your rights in relation to your personal information are:

|  |  |
| --- | --- |
| Access | The right to be provided with a copy of your personal information (the right of access). |
| Rectification | The right to require us to correct any mistakes in your personal information. |
| To be forgotten | The right to require us to delete your personal information in certain situations. |
| Restriction of processing | The right to require us to restrict processing of your personal information in certain circumstances, for example, if you contest the accuracy of the data. |
| Data portability | The right to receive the personal information you provided to us, in a structured, commonly used and machine-readable format and/or transmit that data to a third party in certain situations. |
| To object | The right to object:* at any time to your personal information being processed for direct marketing (including profiling);
* in certain other situations to our continued processing of your personal information, for example, processing carried out for the purpose of our legitimate interests.
 |
| Not to be subject to automated individual decision making | The right not to be subject to a decision based solely on automated processing (including profiling) that produces legal effects concerning you or similarly significantly affects you. |

Any requests received by Scotland Sports Club will be considered under applicable data protection legislation.

## How to complain

If you have any concerns about our use of your personal information, you can make a complaint to us at DP@ScotlandSportsClub.co.uk.

If you remain dissatisfied, you have a right to raise a complaint with the Information Commissioner's Office at [www.ico.org.uk](http://www.ico.org.uk)

## Do you need extra help?

If you would like this notice in another format (for example audio, large print, braille) please contact at DP@ScotlandSportsClub.co.uk