

## **Scottish Athletics Limited**

### **Privacy Notice specific to supporting the NHS Scotland Test and Protect strategy**

#### **Introduction**

We are committed to respecting your privacy. This Privacy Notice explains in detail the types of personal data we may collect before, during and after your relationship with us. It also explains how we will store and handle that data, and how we keep it safe. This notice explains how we comply with the law on data protection and what your rights are.

For the health and safety of those involved at athletics events in Scotland, we are recording the name and contact details of everyone who will be present on the day of competition to support NHS Scotland's efforts in tackling coronavirus. This information will be used to enable NHS Scotland and statutory partners to contact you should you have been in a facility used by **scottishathletics** around the same time as someone who has tested positive for coronavirus. Contacting people who might have been exposed to the virus is an important step in stopping the spread.

This notice applies to you if you are an athlete, technical official, volunteer, coach, spectator, employee, parent or guardian in attendance at an event organised by **scottishathletics**. It should also be stated that this notice is not a contract of employment or other contract to provide services.

References to "we", "our" or "us" in this privacy notice are to Scottish Athletics Limited (company number SC217377), registered at Caledonia House, South Gyle, Edinburgh, EH12 9DQ.

#### **What we do**

Scottish Athletics Limited (**scottishathletics**) is the National Governing Body for Athletics in Scotland. A company limited by guarantee (established 2001), **scottishathletics** is affiliated to UK Athletics, which in turn affiliates to World Athletics and the International Paralympic Committee (IPC).

We are in practice an organisation made up of our member clubs. There are approximately 150 athletics clubs across Scotland – offering opportunities for people of all ages to try out, train, embrace and compete in the various disciplines of athletics – and at all levels from jogging (through our **jogscotland** network) to Commonwealth and Olympic Games levels. As an organisation, our structure and business is to a large degree controlled by the Memorandum and our Articles of Association.

#### **What we need**

**scottishathletics** will be a "controller" of your personal information provided to us.

When you attend an event organised by **scottishathletics** directly, or through a **scottishathletics** affiliated club or group or licenced event, you may be asked for personal information specific to assisting with NHS Scotland's efforts in tackling the coronavirus public health pandemic.

Along with the date and time of your arrival and departure, we will collect the following personal data if applicable:

- your name; and
- contact telephone number.

If you do not have a telephone number, you have the option to provide:

- a postal address; or
- an email address.

In order to assist in the containment of the virus, we will only share your data when it is requested directly by NHS Scotland and statutory partners. This will only be in the unlikely event there is a cluster of coronavirus cases linked to the facility.

For further information on the NHS Scotland Test and Protect strategy please visit the NHS website at <https://www.informationgovernance.scot.nhs.uk/use-of-your-data-for-track-trace-isolate-tti/>

### **Why we need your personal information – legitimate purposes**

Broadly speaking '**legitimate interests**' means that we can process your personal information if we have a genuine and legitimate reason **and** we are not harming any of your rights and interests.

Our legitimate reason for processing your data is to assist with NHS Scotland's Test and Protect strategy in relation to the coronavirus public health pandemic.

Before sharing any information we will carefully consider and balance any potential impact on you and your rights.

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 at [dataprotection@scottishathletics.org.uk](mailto:dataprotection@scottishathletics.org.uk) If we agree and comply with your objection, this may affect our ability to undertake the tasks above.

As we work with NHS Scotland to help contain the spread of coronavirus, we are regrettably unable to provide our services to those who do not provide the required contact details. This is a temporary measure to support NHS Scotland's Test and Protect service.

### **Who we share your personal information with**

Information will principally be shared with NHS Scotland to carry out contact tracing as part of the Test and Protect service and for epidemiological purposes linked to infectious disease control, and will not be available to the Scottish Government. In certain circumstances, NHS Scotland may share the data with key delivery partners.

The contact tracing service would use the information provided by us, relevant to a positive case's whereabouts during the infectious period, to inform the process of identifying close contacts where this is a risk of infection. We will not use the data to directly contact you, even in the event of a known outbreak within a facility. Health protection teams will decide on a case-by-case basis on what follow-up action to take. Depending on the circumstances and the length of time that has elapsed, this could include arranging for people to be tested, asking them to take extra care with social distancing and/or – in some circumstances – asking them to self-isolate. In doing so, the intention is that the risk of onward spread of the virus will be greatly reduced, enabling as many people and businesses as possible to continue operating safely

### **How we protect your personal information**

Your personal information is stored on our electronic filing system and our servers based in the

EU, and is accessed by our staff and volunteers for the purposes set out above. In some circumstances we may use third parties located outside the EU, but will ensure they are signed up to the “Privacy Shield”.

### **How long we keep your personal information**

Your personal data will be retained only for the purposes stated in this privacy notice and will be held by us for no more than three weeks (21 days), or as further advised by the Scottish Government.

All personal data will be held and disposed of in a safe and secure manner.

### **Your rights**

You can exercise any of the following rights by writing to us at Data Protection, **scottishathletics**, Caledonia House, South Gyle, Edinburgh, EH12 9DQ, or [dataprotection@scottishathletics.org.uk](mailto:dataprotection@scottishathletics.org.uk)

Your rights in relation to your personal information are:

- you have a right to request access to the personal information that we hold about you by making a “subject access request”;
- if you believe that any of your personal information is inaccurate or incomplete, you have a right to request that we correct or complete your personal information;
- you have a right to request that we restrict the processing of your personal information for specific purposes; and
- if you wish us to delete your personal information, you may request that we do so.

Any requests received by **scottishathletics** will be considered under applicable data protection legislation. 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)