

Scottish Athletics Limited

Privacy Notice for Corporate Members, Volunteers and the Rest of the World

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.

This notice applies to you if you are either:

1. A corporate member;
2. A current or former volunteer, that is someone who is not a Scottish Athletics member, coach or technical official. It should also be stated that this notice is not a contract of employment or other contract to provide services;
3. A fan or supporter of the sport of Athletics who has contacted us to purchase any of our online products and/or signed up to receive updates about upcoming events, offers and ways to get involved further with the sport; or.
4. Not an individual to whom we have provided a specific privacy notice.

References to “we”, “our” or “us” in this privacy notice are to Scottish Athletics Limited (company number SC217377), registered at Laurie Liddell Clubhouse, 42 Peffermill Road, Edinburgh, EH16 5LL.

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, or any respective successor, which is in turn affiliates to World Athletics and the International Paralympic Committee, or any respective successor.

We are in practice an organisation made up of our member clubs, 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.

We may collect some or all of the following types of personal information about you depending on your interaction with us:

- contact details – information that allows us to contact you directly such as your name, postal address, email address, phone numbers;
- personal contact details that you provide for emergency contacts;
- payment details you provide to us so that we may receive or make payments to you, and the details and records of those financial transactions with you;
- all information included as part of the process in establishing whether to enter into or continue a business relationship with you;
- personal history and information, including family details, medical conditions and dietary requirements;
- identification documents such as passport, birth certificate, and utility bills;

- any disciplinary and grievance information;
- records of your interactions with us such as telephone conversations, emails and other correspondence and your instructions to us;
- responses to surveys, competitions and promotions: we keep records of any surveys you respond to or your entry into any competition or promotion we run;
- equality information – disability, gender reassignment, race (which includes ethnic or national origin, colour or nationality), religion or belief, sex (gender) and sexual orientation;
- records of your attendance at any events or competitions hosted by us and our partnership organisations and other event organisers; and

When you volunteer for **scottishathletics** directly or through a **scottishathletics** affiliated club or group and are the point of contact for a particular role, event or program, we may ask you for the following additional personal information:

- date of birth;
- details of any relevant memberships, qualifications and or licences previously or currently held;
- information about your health, including any medical condition, medical records and health professional information;
- referee details and any references provided;
- images in video and/or photographic form and audio recordings;
- your current affiliated club, group or other organisation (if applicable);
- all information included as part of the volunteering recruitment process.

If you are providing us with details of next of kin, family members and emergency contacts they have a right to know and to be aware of what personal information we hold about them, how we collect it and how we use and may share that information. Please share this privacy notice with those of them whom you feel are sufficiently mature to understand it. They also have the same rights as set out in the “Your rights” section below.

Why we need your personal information – contractual purposes

We need to collect your personal information so that we can manage our relationship.

We will use your personal information to:

- provide you with core services;
- provide you with requested information and send you communications relevant to you;
- deal with your queries or complaints, claims, legal disputes or raise queries, claims, legal disputes or complaints with you;
- enter into and perform contracts, where we may be supplying products/services to you and/or you may be supplying products/services to us or we may be involved in similar arrangements with third parties;
- maintain and improve our services and/or products
- send you communications relevant to volunteering opportunities; and
- manage PVG scheme disclosures to inform recruitment decisions.

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 services.

Why we need your personal information – legitimate purposes

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

- promote **scottishathletics** by sending communications for upcoming opportunities. Our competitions and events may be filmed for live streaming purposes 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;
- monitor and develop participation in **scottishathletics** by monitoring engagement and participation through attendance and inviting you to participate in surveys for researching and development purposes;
- assist in delivering new programs for strategic development of the sport;
- respond to and communicate with you regarding your questions, comments, support needs or complaints, concerns or allegations in relation to **scottishathletics** or to raise queries, claims, legal disputes or complaints with you; and
- manage our relationship with you and to operate our organisation.

When you volunteer for **scottishathletics** directly or through a **scottishathletics** affiliated club or group and are the point of contact for a particular role, event or program, we may, in addition process your personal information in pursuit of our legitimate interests to:

- promote and encourage participation of **scottishathletics** competitions and events by sending communications for upcoming volunteering opportunities and other ways of supporting our organisation or the sport
- provide volunteering opportunities to you and to arrange and administer your attendance at an event you have volunteered for;
- invite our volunteers as award winners or guests to our annual awards dinner, which includes asking our clubs to nominate individuals for awards and short listing such individuals to select the winners, who we will then contact by email;
- invite our volunteers as VIPs to reception events by email and post, and to provide names and email addresses to venues where requested for their own legitimate purposes;
- administer drug and alcohol testing and to assess your suitability for any activities or events we host;
- assess your performance and experience for a particular role or task;
- dealing with legal disputes involving you, or any other volunteers, including accidents; and
- respond to and communicate with volunteers regarding your questions, comments, support needs or complaints, concerns or allegations in relation to **scottishathletics**. We will use your personal information to investigate your complaint, to suspend our relationship 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 at dataprotection@scottishathletics.org.uk If we agree and comply with your objection, this may affect our ability to undertake the tasks above.

Why we need your personal information – legal obligations

We are under a legal obligation to process certain personal information for the purposes of complying with our obligations under:

- The Protection of Vulnerable Groups (Scotland) Act 2007 to check that our volunteers are able to undertake paid or unpaid regulated work with children and protected adults. We are a registered body with Disclosure Scotland and the identified suitability decision maker for

all of our affiliated clubs. We manage the PVG application process, any subsequent decisions relevant to the disclosure process and make all suitability decisions relating to PVG;

- The Companies Act 2006 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;
- our **sportscotland** and Scottish Government regulatory requirements to report on the size, achievements and profile of our volunteers; and
- the Equality Act 2010, which requires us to process personal information to make reasonable adjustments where necessary.

Why we need your personal information – equality monitoring requirements

The Equality Act 2010 identifies nine protected characteristics: age, sex, gender reassignment, disability, race, sexual orientation, religion or belief, marriage and civil partnership, and pregnancy and maternity. Additional equality data might also include data such as postcode to identify SIMD (Scottish Index of Multiple Deprivation) and/or rural exclusion.

We are required to use our members' personal information relating to your age, disability, gender reassignment (trans status) race/ethnicity, religion or belief, sex, sexual orientation, SIMD (postcode) for equality monitoring purposes as required by **sportscotland** and as part of our continual internal assessment process for the Moving to Inclusion Framework.

We will process such personal information through aggregated and anonymised reports to identify and keep under review the existence or absence of equality of opportunity or treatment between groups of people within the same categories to promote or maintain equality within our sport.

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.

We may be asked by our member clubs to collect and store personal information about their individual members. Where we do this, the clubs have a responsibility as "controllers" to provide their members with privacy notices and we will not use such personal information for any other purpose.

Who we share your personal information with

If your personal information is included in any images or videos we take, or are taken on our behalf, we may share this with event or official project partners, including but not limited to Vinco, Brand Oath, Team Scotland and **sportscotland**, for promotional and/or journalistic purposes. We may also use such images and videos across the **scottishathletics** and **jogscotland** program media channels and social media platforms, including but not limited to our websites, our YouTube channel, Facebook pages and Twitter feeds as well as Instagram and Snapchat.

We may also share your information with the likes of Team Scotland and UK Athletics for the purposes of award nominations.

We may be required to share personal information with statutory or regulatory authorities and organisations to comply with statutory obligations, such as assisting with the investigation and prevention of crime and the protection of national security, and with external audit requirements. Organisations include the Health & Safety Executive, Disclosure Scotland, and Police Scotland for the

purposes of safeguarding children and protected adults, local authorities, such as social work, education (including named persons).

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

scottishathletics employs third party suppliers to provide services, for example, payment processors, promotional advisors, contractors or suppliers and IT services (including, websites and web portal platforms and video). These suppliers may process personal information on our behalf as “processors” and are subject to written contractual conditions to only process that personal information under our instructions and protect it in accordance with existing legislation on data protection. 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. If we stop using their services, any personal data held by them will be deleted.

We may also share your personal information with our supply chain partners and sub-contractors, such as couriers, travel and logistics providers, printing and event fulfilment providers.

We may also be required to share personal information relating to 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.

We may also share your information with other governing bodies or regional bodies for the sports covered by our organisation to allow them to properly administer the sports on a local, regional, national and international level, and with UK Athletics to maintain your records within and access to database and website systems.

Fair Processing Notice (FPN): Safeguarding

The Data Protection Act 2018 requires that you are informed about how your personal information will be used. For the purposes of safeguarding, wellbeing and safe sport matters in Scotland, if **scottishathletics** or your club receives information of concern; **scottishathletics** or your club may share information about you with each other, as well as UK Athletics and where relevant other governing bodies in the UK. This may be related to, but not exclusively restricted to, where the organisation sharing the information has been alerted to circumstances that might affect your status as a member of the PVG scheme for regulated work/regulated roles with children or protected adults. Or your suitability to carry out the regulated work/regulated role for which you have applied/been appointed or already doing. In the event such sharing is deemed necessary, it will normally only be carried out between the Safeguarding Officers in the Club, Governing Body, and those appointed representatives within the relevant partner organisation.

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”.

Where your personal information is transferred outside the EU, we will provide you with information regarding the safeguards that we have put in place with the recipient country to protect your personal information.

How long we keep your personal information

We will only keep your personal information for as long as necessary. Unless you ask us not to, we will review and possibly delete your personal information where you have not engaged with us for six years.

We will keep certain personal information for longer in order to confirm your identity, when you engaged with **scottishathletics** and for how long. We need to do this to satisfy our current and potential insurance obligations in the event of a claim against **scottishathletics**.

Your rights

You can exercise any of the following rights by writing to us at Data Protection, **scottishathletics**, Laurie Liddell Clubhouse, 42 Peffermill Road, Edinburgh, EH16 5LL, or 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