

# *CLUB POLICY*

## *001*

Privacy & GDPR

*FIFE NORDIC SKI CLUB*

*April 2022 | V00*

**Version Tracking**

<b>Version</b>	<b>Date</b>	<b>Amendments</b>	<b>Editor</b>	<b>Sign off</b>
V0	21/04/22	First draft prepared	Sarah Young	



## **CLUB PRIVACY POLICY**

### **What we need**

1. This policy explains when and why we collect personal information about our members and coaches, how we use it and how we keep it secure and your rights in relation to it.
  - 1.1 We may collect, use, and store your personal data, as described in this Data Privacy Policy,
  - 1.2 and as described when we collect data from you.
  - 1.3 We reserve the right to amend this Data Privacy Policy from time to time without prior notice. You are advised to check with the club Chairperson or WPO for any amendments (but amendments will not be made retrospectively).
  - 1.4 We will always comply with the General Data Protection Regulation (GDPR) when dealing with your personal data. Further details on the GDPR can be found at the website for the Information Commissioner ([www.ico.gov.uk](http://www.ico.gov.uk)). For the purposes of the GDPR, we will be the “controller” of all personal data we hold about you.
2. Fife Nordic Ski Club (FNSC) is affiliated with Snowsport Scotland. FNSC will be a controller of the personal information that you provide to us through the club representatives.

### **Members’ personal data**

3. When you register as a member of FNSC or renew your membership (including if you are registering or renewing on behalf of a child under the age of 16) we will ask you for the following personal information:
  - Contact details – name, address, email address, date of birth,;
  - Membership criteria / category – athlete, parent, or volunteer,;
  - Payment details – bank account number, sort code, card details, etc.;
  - Equality information – disability;
  - Emergency contact details.

### **Volunteers’ personal data:**

4. When you volunteer with FNSC, we will ask you for the following personal information:
  - Contact details – name, address, email address, PVG membership and status of officiating level if required

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

5. Members’ personal data:



5.1 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 information on the Club, including session times
- For the purposes of our legitimate interests in holding races for the benefit of members of the Club.
- Setting up and renewing annual membership
- General membership services, including but not limited to AGMs

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

6. Participants' personal data:

6.1 When you register for a competition, event, training course, etc., we need to collect your personal information so that we can honour your booking and to enable you to participate in the course, competition, event, etc.

6.2 If you do not provide us with all of the personal information that we need to collect then this may affect our ability to enter you in a competition or event, or book your place on a training course.

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

7. Members' personal data:

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

- promote and encourage participation in skiing 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 skiing by accepting and managing entries for our competitions and checking your personal information to ensure you are entered into the correct category;
- monitor and develop participation in skiing by monitoring members' engagement and participation through SSS rules and inviting our members to participate in surveys for researching and development purposes;
- invite our members as award winners or guests to our club events, which may include asking our members to nominate individuals for awards and shortlisting such individuals to select the winners, who we will then contact by email;



- 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;
- respond to and communicate with members regarding your questions, comments, support needs or complaints, concerns or allegations in relation to skiing. SSS has separate policies governing complaints and disciplinary procedures and we will use your personal information to investigate your complaint, to suspend membership, take disciplinary action, etc.
- 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. 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.

8. Volunteers' personal data:

- 8.1 We will need to collect personal information relating to criminal convictions or alleged commission of criminal offences where you are required to complete a PVG check under the Protection of Vulnerable Groups (Scotland) Act 2007. This information will include your PVG certificate number, PVG membership number, date of issue and any relevant information in relation to your membership of the PVG Scheme.
- 8.2 If your PVG certificate is not clear, we will have a legitimate interest to collect references and any other applicable information to allow us to consider whether or not you can volunteer in a regulated role with children and/or vulnerable adults.
- 8.3 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 . If we comply with your objection, this may affect our ability to undertake the tasks above for the benefit of you as a volunteer.

**Why we need your personal information – legal obligations**

9. We are under a legal obligation to process certain personal information relating to our club members and volunteers for the purposes of complying with our obligations under:
  - the Charities and Trustee Investment (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;
- our SSS regulatory requirements;
- the Equality Act 2010, which requires us to process personal information to make reasonable adjustments where necessary

### **Other uses of your personal information**

10. 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**

11. If your personal information is included in any images or videos taken by us at our competitions and events, we may share this with SSS and / or British Nordic for promotional and/or journalistic purposes.
12. 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.
13. We may also share personal information with our professional and legal advisors for the purposes of taking advice.
14. 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.

### **Athletes' / Participants' personal data**

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

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

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

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

17. Members' personal data
  - 17.1 We will only keep your personal information for as long as necessary to provide you with membership services. Unless you ask us not to, we will



review and possibly delete your personal information where you have not renewed your membership with us for 2 years.

17.2 We will keep certain personal information of members for longer in order to confirm your identity, when you were a member of FNCS and for how long. We need to do this in the event of a claim against FNCS.

18. Athletes' personal data

18.1 We keep our athletes' personal information for up to 1 year after the athlete ceases to be with FNCS.

**Your rights**

19. You can exercise any of the following rights by writing to us at [fiferollerski@gmail.com](mailto:fiferollerski@gmail.com). 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.

20. Any requests received by FNCS 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).