

## **HIGHLAND RUGBY FOOTBALL CLUB [SCIO]**

### **GENERAL DATA PROTECTION REGULATIONS**

#### **PRIVACY NOTICE – MEMBERS (INCLUDING PLAYERS AND VOLUNTEERS)**

##### **Introduction**

Highland Rugby Football Club [SCIO] (“the Club”) is a Club registered by the SRU, a charity registered by OSCR (charity number SC047400) and a Scottish Charitable Incorporated Organisation (SCIO).

This Notice summarises the key matters for the purposes of the General Data Protection Regulations (GDPR) for you, as a member and/or volunteer of the Club.

The Club is a “data controller” of the personal information that you provide to us when you register as a member or volunteer to help with the activities of the Club. The Club is committed to protecting your personal data and respecting your privacy.

##### **The data we hold**

The personal data held is all obtained directly from you, either online or by means of completed forms or feedback.

The types of data we hold and process about you include:-

- contact details - Name address, email address, date of birth, etc.
- membership criteria / category – for example, Player, family, life, etc.
- payment details – bank account number, sort code, card details, etc.
- participation details – for example, active player coach, etc.
- medical conditions
- training records
- personal development, including nutrition requirements
- equality information – for example, disability, etc.
- other personal information, for example, PVG membership.
- In the case of junior members under the age of 18, we additionally hold contact details of parents.

##### **Use of your Personal Information Data**

We need to collect our members’ personal information so that we can manage your membership and will use it to:

- Provide you with core member services, including voting, information about membership and activities hosted by the club.

- Send you membership communications [by post or email] in relation to essential membership services, including but not limited to, general meeting notices, membership renewals, membership fees' information, SR information and details.

If you do not provide us with all of the personal information that we need to collect then this may affect our ability to provide you with the information you require.

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

- Promote and encourage participation in rugby union by sending communications and booking information for upcoming competitions and events, although this is mostly achieved through our website and social media channels.
- Provide competition in Rugby 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 Rugby by monitoring engagement and participation through questionnaires and inviting our members to participate in surveys for researching and development purposes
- Invite our members as award winners or guests to our annual awards dinner/ceremony which includes 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' and volunteers' 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 and volunteers regarding your questions, comments, support needs or complaints, concerns or allegations in relation to Rugby, for example, we will use your personal information to investigate your complaint, to suspend membership, take disciplinary action, etc.
- We may require to share information with our governing body, the SRU in respect of international tickets, for example.
- 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 may use for promotional, education or development purposes.
- We will need to collect personal information relating to criminal convictions or alleged commission of criminal offences if you are undertaking coaching of young children or vulnerable groups and 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.

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.

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 by email at [secretary@highlandrugbyclub.org](mailto:secretary@highlandrugbyclub.org) 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.

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

In addition to our legal obligation to process certain personal information relating to our members under the Protection of Vulnerable Groups legislation we also have further legal obligations to share personal information under the following legislation:

- 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 Equality Act 2010, which requires us to process personal information to make reasonable adjustments where necessary.

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

### **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 and press releases we may share this with SRU 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.

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

The Club employs third party suppliers to provide services, including IT, payroll, etc.. 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 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.

As a member club of the SRU we are required to ensure that all of our members are registered with the SRU as a condition of our registration/membership. We will share player registration, age etc with the SRU who will become a controller of your personal information when they receive it.

In the event that we are required to 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.

### **How we protect your Personal Information Data**

Your personal data is held and maintained by our Membership Secretary in a secure and encrypted electronic file and will only be available for the uses outlined above

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.

If we are required to transfer your personal information out with the EU for the purposes of for example, entering into competitions, booking travel arrangements, etc, we will provide you with information regarding the safeguards that we have put in place with the recipient country to protect your personal information.

Some limited data may be held as hard copy in a secure location with restricted access.

### **Keeping of Records**

We shall only keep your data for as long as we need to fulfil the purposes for which it was collected and subject to the requirements of law. On resignation from the Club your personal data records will normally be retained by the Club for up to 6 years, or longer in the event of legal actions against the Club, or in the event that the Member has outstanding subscriptions when leaving.

### **Your rights**

You can exercise any of the following rights by writing to us at [secretary@highlandrhc.com](mailto:secretary@highlandrhc.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.

Any requests should be sent to [secretary@highlandrhc.com](mailto:secretary@highlandrhc.com) and 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 ([www.ico.org.uk](http://www.ico.org.uk)).

### **Update**

We may update this Notice from time to time. We shall inform you of the changes and the date on which the changes take effect.

September 2021



