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| sportscotland |
| Clubs template privacy notice wording |

*Drafting Note: This template sets out the headings required under the GDPR. Where possible, we have sought to include options for different categories of data subject and include examples. Clubs should use this template to create bespoke privacy notices for their own use, by using the headings and example text where appropriate by completing the text in square brackets*

## What we need

[insert background information re club, such as structure, whether affiliated with any other organisations, for example, a SGB, etc.]

[insert name of club] will be a "controller" of the personal information that you provide to us [in this form / through this website, etc.] [unless otherwise stated].

## *Option 1 – Members' personal data*:

When you register as a member of [insert name of club] or renew your membership (including if you are registering or renewing on behalf of a child under the age of [insert age limit]), we will ask you for the following personal information:

* [contact details– name, address, email address, date of birth, etc.];
* [membership criteria / category – for example, athlete, parent, volunteer, etc.];
* [payment details – bank account number, sort code, card details, etc.];
* [participation details – for example, parent, athlete, etc.];
* [equality information – for example, disability, etc.]; and
* [insert any other personal information, for example, PVG membership, IP address, etc.].

## *Option 2 – Volunteers' personal data:*

When you volunteer with [insert name of club], we will ask you for the following personal information:

* [contact details – name, address, email address, date of birth, etc.];
* [participation details – for example, parent, committee, etc.];
* [equality information – for example, disability, etc.]; and
* [insert any other personal information, for example, PVG membership, IP address, etc.].

## Why we need your personal information – contractual purposes

## *Option 1 – Members' personal data:*

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 [insert key service purposes, for example, insurance, licensing, voting, etc.]];
* [set up your online membership account and [insert any other uses online]];
* [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, etc.]]; and
* [insert any other contractual membership requirements].

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.

## *Option 2 – Participants' personal data:*

When you book a place with us for and attend a [coaching course, 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.].

If you do not provide us with all of the personal information that we need to collect then this make affect our ability to book your place.

## Why we need your personal information – legitimate purposes

## *Option 1 – Members' personal data:*

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

* [promote and encourage participation in [insert sport] 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 [insert sport] 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 [insert sport] by monitoring members' engagement and participation through [insert uses] 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' 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 [insert sport]. [insert details re complaints and disciplinary procedures, for example, we will use your personal information to investigate your complaint, to suspend membership, take disciplinary action, etc.]; and
* [insert any other legitimate interests and details of uses of personal data].

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 [insert details]. 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.

## *Option 2 – Volunteers' personal data:*

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.

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 on [insert details]. 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

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

* [the [Companies Act 2006 / 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 **sport**scotland regulatory requirements to [insert details of how personal data is processed to comply with these obligations]];
* [the Equality Act 2010, which requires us to process personal information to make reasonable adjustments where necessary]; and
* [insert any other applicable legal requirements].

## Other uses of your personal information

We may ask you if we can process your personal information for additional purposes. [For example, [insert examples].] 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 [insert name of club] 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 and [insert any other purposes]].

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

[insert name of 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.

## *Options 1 – SGB Members' Personal Data*

As [a registered / a member / an affiliated] club of [insert name of SGB] we are required to ensure that all of our members are members of [insert name of SGB] as a condition of our [registration / membership / affiliation].

We will share [insert details of what is shared and why] with [insert name of SGB] who will become a controller of your personal information when they receive it. [insert name of SGB]'s privacy notice explains how they use your personal information and can be accessed here [insert link].

## *Option 2 – Athletes' / Participants' personal data*

We publish the results of our competitions on our website. This includes competitors' [name, age, result].

## How we protect your personal information

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

[We are required to transfer your personal information outwith the EU for the purposes of [insert details - for example, entering athletes into competitions, booking travel arrangements for training camps, etc.]. Where your personal information is transferred outwith 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

## *Option 1 - Members' personal data*

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 [insert number] years.

We will keep certain personal information of members for longer in order to confirm your identity, when you were a member of [insert name of club] and for how long. We need to do this to [comply with the Companies Act 2006, which requires us to keep a register of members] or [in the event of a claim against [insert name of club]].

## *Option 2 – Athletes' personal data*

We keep our athletes' personal information for [insert details of period or criteria used to determine period].

[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 [insert contact details].]

## Your rights

You can exercise any of the following rights by writing to us at [insert address / email address][ or by logging on to your account at [insert details].

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 [insert name of club] 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)

# [Club template - consent section for privacy notice

## Why we need your personal information – marketing

Where you are happy for us to do so, we would like to contact you by email with information about [insert sport], our latest news and upcoming events / competitions / courses.

If you would like to receive email communications from us, please select from the following options below:

* [insert option – for example, information about [insert name of sport]];
* [insert option – for example, latest news];
* [insert option – for example, details of upcoming events].

[Once you submit your preferences to us, we will send you an email to confirm these. Please note that we will not email you with any information until you have confirmed your preferences by responding to our email.]

You may change your preferences at any time or request that we stop sending you email communications by contacting us at [insert details] [or logging in to your account at [insert details]]. There is also an 'unsubscribe' button at the bottom of every email communication we send.

[insert details of a third-party service provider or third party communications here if relevant].]