

Helensburgh Amateur Athletics Club

Data Protection Policy

Mar 2023

(Revised to comply with GDPR 2018)



What we need

Helensburgh Amateur Athletic Club, hereafter known as HAAC, is dedicated to 'encouraging the advancement of public participation in sport, and specifically the sport of amateur athletics. HAAC is affiliated to, and abides by the rules and regulations of, Scottish Athletics who are our National Governing Body (NGB).

HAAC will be a "controller" of the personal information that you provide to us via membership applications and requests to be added to a waiting list. On occasion, it will be necessary for HAAC to pass information to Scottish Athletics or other third parties (e.g. for affiliation purposes, competition entries, etc.). Where this is the case then the third party becomes the controller of the disclosed personal data.

HAAC is made up of a Junior Section (9-18 years) and a Senior Section (18 years and over). This policy covers both the Junior and Senior Sections however certain parts are only applicable to one of the sections; where this is the case it will be specified.¹

Members' personal data:

When you register as a member of HAAC, or renew your membership (including if you are registering or renewing on behalf of a child under the age of 18), we will ask you for the following personal information:

- Contact details
 - Athlete's name, date of birth, address
 - E-mail address (Seniors only)
 - Parent / Carer's email address (Juniors only)
 - Parent / Carer's telephone contact number(s) (Juniors only)
- Membership category - Athlete, Volunteer, Coach, Associate, Honorary Life Member.
- Health information - Information which HAAC coaches should be aware of to maintain the health and safety of athletes during training sessions and competitions *(This is classed as special category personal data – any special category health data we hold on you will only be processed and passed to the appropriate coaches to ensure the safety of athletes.)*
- Volunteer status - i.e. would the Parent(s)/Carer(s) be willing to assist with coaching, officiating or other volunteer roles
- Scottish Athletics status - Scottish Athletics Membership number (if applicable)

Coaches and Volunteers' personal data:

When you volunteer with HAAC we will ask you for the following personal information:

- Contact details - Name, address, email address, date of birth, telephone number(s)
- Other personal information - PVG membership.

¹ In particular, the use of TeamApp is currently applicable only to the Junior Section of the club and the use of EntryCentral is only applicable to the Senior Section.



Prospective members' personal data (applicable only to the Junior section of HAAC):

When you request to be added to the waiting list for a place with HAAC we will ask you for the following personal information:

- Contact details
 - Athlete's name, date of birth
 - Parent / Carer's email address, telephone contact number

Why we need your personal information – contractual purposes

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 but not limited to: general administration and management of membership, administering NGB affiliations, administering competition entries, providing voting rights, etc.
- send you membership communications (by email or via TeamApp²) in relation to essential membership services, including but not limited to: training information (including dates, times, locations, applicability, and cancellation of sessions, etc.), competition information (dates, applicability, sign-up options, team selections, etc.), volunteer requests, promotions for members, general meeting notices, membership renewals, etc.

For members of the Senior Section of HAAC we will also use our members' personal information to:

- Administer your online membership account via the Entry Central website which we use to manage your membership. **Please read the full terms and conditions and privacy notice of Entry Central before signing up - www.entrycentral.com/terms-and-conditions/privacy**

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.

Participants' personal data:

When you book a place with HAAC to attend a competition, event, coaching course, 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 competition, event, course etc.

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

Prospective members' personal data: (Juniors only)

We need to collect potential members' personal information so that we can manage your membership. We will use this information to manage the waiting list and offer a place in an appropriate training group when space becomes available.

² TeamApp is applicable only to the Junior Section. Please read the full terms and conditions and privacy notice of TeamApp which is available at www.TeamApp.com/privacy



Why we need your personal information – legitimate purposes

Members' personal data:

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

- promote and encourage participation in athletics 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 athletics 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 athletics by monitoring members' engagement and participation through attendance registers³ 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 ceremony, which may include asking our members to nominate individuals for awards and shortlisting such individuals to select the winners;
- respond to and communicate with members regarding your questions, comments, support needs or complaints, concerns or allegations in relation to athletics. For example, 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 at haacsecretary3@gmail.com. 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.

Volunteers' personal data:

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

- develop and maintain our volunteers' / members' qualifications, including sending email or TeamApp communications to members to inform you of upcoming courses, renewal requirements and to verify that you have completed any mandatory training and PVG / child protection requirements;

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 haacsecretary3@gmail.com. If we comply with your objection, this may affect our ability to undertake the tasks above for the benefit of you as a volunteer.

³ For Juniors this is recorded on TeamApp and periodically stored on DropBox (privacy policy of Dropbox is available at <http://www.dropbox.com/privacy2023>).



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

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.

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 Scottish Athletics 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 vulnerable adults.

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

HAAC utilises third party suppliers to provide services, including web and web/phone applications hosting - for the Junior Section this includes the use of TeamApp and for the Senior Section this include the use of EntryCentral. These suppliers may process personal information on our behalf as "processors".⁴

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.

NGB members' personal data

As an affiliated club of Scottish Athletics (our National Governing Body) we are required to ensure that all of our members are members of Scottish Athletics as a condition of our affiliation.

We will share personal details (e.g. name, date of birth, Scottish Athletics (SA) registration number) with Scottish Athletics who will become a controller of your personal information when they receive it. Scottish Athletics' privacy notice explains how they use your personal information and can be accessed here

<https://www.scottishathletics.org.uk/about/privacy-notices/>.

⁴ TeamApp privacy policy can be found at www.teamapp.com/privacy. The EntryCentral Privacy Policy can be found at www.entrycentral.com/terms-and-conditions/privacy.



Athletes' / Participants' personal data

We may publish the results of our competitions and events, including accompanying photographs, on our website, the Club TeamApp application (Juniors only) and the HAAC Website⁵ and HAAC FaceBook page (Seniors only), and in local newspapers and press for the purpose of promotion of the achievements of individuals, teams and HAAC. This may also include competitors' name, age category and result.

How we protect your personal information

For the Junior Section:

Your personal information is stored on our electronic filing system and is backed up using DropBox⁶ servers based in the US and is accessed by our coaches / volunteers for the purposes set out above. Copies of membership forms are also retained by the Junior Membership Secretary. Some information is also stored on Stack TeamApp, links to Stack TeamApp's Terms of Service⁷ and Privacy Policy⁸ are available below. Electronic data is protected by password-controlled systems, and paper records are securely held away from club premises. Access to personal data is limited to those who have a legitimate need-to-know.

For the Senior Section:

Your personal information is stored on the Entry Central website (www.entrycentral.com) and in paper and electronic records by the Membership Secretary. Electronic data is protected by password-controlled systems, and paper records are securely held away from club premises. Access to personal data is limited to those who have a legitimate need-to-know and only for the purposes set out above.

How long we keep your personal information

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 two years.

Your rights

You can exercise any of the following rights by writing to us at haacsecretary3@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

⁵ HAAC's website is available at: www.Helensburghaac.com

⁶ DropBox's Data Protection Policy can be accessed at: <http://www.dropbox.com/privacy2023>.

⁷ Stack TeamApp Terms of Service is available at: <https://www.teamapp.com/terms>.

⁸ Stack TeamApp privacy policy is available at: www.teamapp.com/privacy.

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- if you wish us to delete your personal information, you may request that we do so.
- Any requests received by HAAC 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