

**GARSCUBE HARRIERS PRIVACY POLICY 2018**

**1. About this Policy**

1.1 This policy explains when and why we collect personal information about:

* our members (junior and senior)
* our volunteers (e.g. coaches and committee members)
* prospective junior members on our waiting list
* non-members who participate in our open race events

The policy covers how we use your personal information, how we keep it secure, and your rights in relation to it.

1.2 We will collect, use and store your personal data as described in this Privacy Policy, and as referred to when we collect data from you via our online membership forms, race registration forms and other reasonable means.

1.3 We reserve the right to amend this Privacy Policy from time to time without prior notice. You are advised to check our website - [www.garscubeharriers.co.uk](http://www.garscubeharriers.co.uk/) - for any amendments.

1.4 We will always comply with the EU General Data Protection Regulation (GDPR), transposed into UK data protection law from 25th May 2018, 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 are the “data controller” of all personal data we hold about you.

**2. About us**

2.1 We are Garscube Harriers, a Community Amateur Sports Club (CASC), affiliated with Scottish Athletics, and based in Glasgow, UK. We can be contacted at Garscube Sports Complex, West of Scotland Science Park, Glasgow, G20 0SP or via the ‘Contact Us’ facility on our website.

**3. What personal information do we collect?**

3.1 The following table sets out the personal information we collect from you, why we need to collect it, and the legal basis for processing it under the GDPR.

|  |  |  |
| --- | --- | --- |
| Personal data | Purpose | Legal basis for processing |
| Member or Prospective Member’s name, address, telephone number, email address | Managing the individual’s membership of the club  To notify Members of internal and external race meetings and events | For the purpose of the **Performance of Contract** with the Member or the Guardian of Members under the age of 13  For the purpose of our **Legitimate Interest** in operating the club |
| Volunteer’s name, address, telephone number and email address | Organising training sessions, committee meetings, race events and other club events | For the purpose of our **Legitimate Interest** in operating the club |
| Volunteer’s PVG certificate, number, date of issue and other relevant information relating to Scheme membership | To ensure that our coaches and volunteers are able to undertake regulated work with children and vulnerable adults | For the purpose of carrying out our **Legal Obligation** under the Protection of Vulnerable Groups (Scotland) Act 2007 |
| Race participant’s name, address, telephone number and email address | Maintaining a participation list for each open race event staged by the club | For the purpose of the **Performance of Contract** with the race participant |
| Emergency contact details | Contacting next of kin in the event of an emergency | For the purpose of protecting the **Vital Interests** of Members and race participants |
| Health conditions | Coaches are aware of, and can provide assistance in the event of, declared health conditions affecting a Member during training | For the purpose of protecting the **Vital Interests** of Members |
| Date of birth/age | Managing Membership/Prospective Membership and Race categories which are age related | For the purpose of the **Performance of Contract** with the Member/ Guardian of Members under the age of 13/race participant |
| Gender | Managing Membership/Race categories which are gender related  Providing facilities to Members/race participants | For the purpose of the **Performance of Contract** with the Member/ Guardian of Members under the age of 13/race participant  For the purpose of our **Legitimate Interest** in providing gender-appropriate changing and toilet facilities |
| Member/participant’s name, gender and age category | Managing race entries and results  Sharing race results with Scottish Athletics and providing race results to local and national media. | For the purpose of our **Legitimate Interest** in holding races for the benefit of Members and other athletes  For the purpose of our **Legitimate Interest** in promoting the club |
| Photos and videos of members | Using images on the club’s website, social media platforms and in press releases | **Consent**. We will seek the member’s consent on their membership application form and each membership renewal form. The member may withdraw their consent at any time by contacting us by e-mail or letter.  For members under the age of 13, consent will be sought from the parent/guardian on the same terms.  For open races, consent will be sought from participants via the race registration form. |
| Former member’s name, e-mail address and date of membership expiry | SCIO registration requirement | For the purpose of our **Legitimate Interest** in securing the club’s charitable status |

**4**. **How we protect your personal data**

4.1 We have implemented generally accepted standards of technology and operational security in order to protect personal data from loss, misuse, or unauthorised alteration or destruction.

4.2 We use [www.paysubsonline.com](http://www.paysubsonline.com) as our “data processor“ for processing all personal data for membership registration purposes, including payment of subscriptions. The online facility provided by the data processor fully complies with GDPR requirements. For further details, please refer to the data processor’s own Privacy Policy.

4.3 Where we require to use your personal data for operational purposes described in Table 3.1, we restrict its access to coaches and the Membership Secretary of the club.

4.4 We will notify you promptly in the event of any breach of your personal data which might expose you to serious risk.

**5.** **Who do we share your information with?**

5.1 We will never sell your personal data or transfer it outside the EU. We will not share your personal data with any third parties without your prior consent (which you are free to withhold) except where required to do so by law or as set out in Table 3.1.

5.2 We may pass your personal data to third parties who are service providers, agents and subcontractors to us for the purposes of completing tasks and providing services to you on our behalf (e.g. to print newsletters and send you mailings subject to your consent). However, we disclose only the personal data that is necessary for the third party to deliver the service and we have a contract in place that requires them to keep your information secure and not to use it for their own purposes.

1. **How long do we keep your information for?**

6.1We will hold your personal data on our systems for as long as you are a member of the club and for as long afterwards as it is in the clubs’ legitimate interest to do so. We will review your personal data every year to establish whether we are still entitled to process it. If we decide that we are not entitled to do so, we will stop processing your personal data. For further information, please contact our Data Protection Manager using the contact details provided in 2.1.

**7**. **Your rights**

7.1 You have rights under the GDPR:

* to access your personal data
* to be provided with information about how your personal data is processed
* to have your personal data corrected
* to have your personal data erased in certain circumstances
* to object to or restrict how your personal data is processed
* to have your personal data transferred to yourself or to another party in certain circumstances
* to withdraw your consent - where this is the legal basis for processing your personal information - for the purpose(s) for which the consent was originally given

7.2 Please contact us if you wish to exercise any of these rights.

7.3 For any questions, comments, requests or concerns regarding our data processing practices, please contact our Data Protection Manager using the contact details provided in 2.1.

7.4 You also have the right to take any complaints about how we process your personal data to the Information Commissioner:

<https://ico.org.uk/concerns/>

0303 123 1113.

Information Commissioner's Office

Wycliffe House

Water Lane

Wilmslow

Cheshire SK9 5AF