# LOTHIAN RUNNING CLUB PRIVACY POLICY



Rev 1.1 - 07 Jan 2019

## WHO WE ARE

References to "we", "our" or "us" in this privacy notice are to Lothian Running Club. Lothian Running Club is an Athletics and Running Club, and an affiliated member of scottish athletics (Scottish Athletics Ltd). Lothian Running Club are committed to maintaining the trust and confidence of our website visitors, and club members.

Lothian Running Club will be a "Controller" of personal information provided to us by our members. This Privacy Policy will provide detailed information on when and why we collect your personal information, how we use it, the limited conditions under which we may disclose it to others and how we keep it secure.

## **PRIVACY NOTICE FOR MEMBERS, COACHES, AND VOLUNTEERS**

### 1. What we need

#### Members

When you apply for, or renew your membership of Lothian Running Club we will ask for the following information about you and/or a child under 18 on whose behalf you are applying:

- Contact Details: Name, address, phone number, email address
- Personal Information: Date of Birth, Gender
- Membership Category: (athlete, first claim, second claim etc. and optionally the name of previous clubs)
- Scottish Athletics Membership Number
- Pertinent Medical Information relating to conditions which may affect you or your child during training or competition.
- Emergency contact details.
- Consent to enroll you for the club newsletter.

If you are providing us with details of next of kin, family members, and emergency contacts they have a right to know and to be aware of what personal information we hold about them, how we collect it and how we use and may share that information. Please share this privacy notice with those of them whom you feel are sufficiently mature to understand it. They also have the same rights as set out in the "Your rights" section below.

We keep a record of individual attendance at training nights.

Records and assessment of any rankings and competition results, details regarding events attended and performance.

#### **Coaches and Volunteers**

- Details of coaching qualifications and certificates
  - PVG Certificates.

## 2. How we obtain your information

We obtain your personal information when you complete and send us a paper Membership Application form, or when you complete an online subscription using the QBuster service. Members using the QBuster service should review the QBuster privacy policy (<u>https://www.q-buster.co.uk/privacy</u>).

Qualifications certificates and PVG information is supplied by you to the club welfare officer.

Lothian Running Club Privacy Policy for Members http://www.lothianrunnigclub.co.uk/privacy

## 3. Why we need your personal information

#### **Contractual Purposes**

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, insurance, licensing and PVG checks.
- Send you membership communications by post or email in relation to essential membership services, including but
  not limited to, membership renewals, information on membership benefits, and notification of Annual General
  Meetings.
- Provide entry to team events by checking personal information, and by ensuring you are entered in the appropriate category.

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.

#### Legitimate Interest

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

- Monitor and develop participation in Lothian Running Club by monitoring members' engagement and participation through attendance and inviting our members to participate in surveys for researching and development purposes.
- Develop and maintain our members' and coaches' 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 Lothian Running Club. We will use your personal information to investigate your complaint, suspend membership and take disciplinary action where appropriate.
- Retaining personal data for historical and statistical purposes such as competition results.
- If you have opted to signed up for the club newsletter, we will use your email address to send you news and updates
  relating to the club or athletics in general, e.g. weekly results, upcoming events, and opportunities. You can
  unsubscribe from this list at any time. If you do unsubscribe, we may still use your email address to contact you in
  relation to core club services as above.
- Post athletics results on our website and social media sites and distribute via our email list.

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 dataprotection@lothianrunningclub.co.uk. 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.

#### Legal Obligations

We are under a legal obligation to process certain personal information relating to our members, coaches and volunteers for the purposes of complying with our obligations under 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.

#### Other Uses

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.

## 4. Who we share your personal Information with

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.

Lothian Running Club Privacy Policy for Members http://www.lothianrunnigclub.co.uk/privacy We may also share personal information with our professional and legal advisors for the purposes of taking advice.

As an affiliated club of **Scottish** Athletics Ltd., we will share your name and membership category (age group and gender) with Scottish Athletics Ltd., 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 <u>https://www.scottishathletics.org.uk/about/privacy-notices/</u>.

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.

#### 5. How we protect your personal information

Your personal information is stored on our electronic filing system and protected by a secure password. Access is restricted to a limited number of club officials for the purposes set out above. We may from time to time make use of reputable and secure cloud file sharing services (e.g. Drop Box), located in the EU or signed up to 'Privacy Shield' (<u>https://www.privacyshield.gov/welcome</u>), to facilitate access to your data for the purposes described above. In such cases access will be strictly controlled and restricted to authorised club officials for legitimate purposes.

If you provided a paper application form, this is kept securely by the club membership secretary.

Where your application was made using the QBuster service, a copy of your details will be stored on the QBuster servers and is accessible by a limited number of club officials. See the QBuster privacy policy (<u>https://www.q-buster.co.uk/privacy</u>)

A paper copy of member emergency contact details, and necessary medical information are additionally stored in a locked cupboard at the club running track, where they can be easily accessed if they are required during training.

### 6. How long we keep your personal information for

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 up to six years.

We will keep certain personal information of members for longer in order to confirm when you were a member of **scottish**athletics and for how long.

We may keep records of athletic performances indefinitely unless you ask us not to.

## 7. Your Rights

You can exercise any of the following rights by writing to us at dataprotection@lothianrunningclub.co.uk.

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 Lothian Running 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