

## **Alloa Gymnastics Club Data Protection Privacy Notice**

The GDPR is Europe's new framework for data protection laws. It replaces the previous 1995 data protection directive, which current UK law is based upon. The new regulation started on 25 May 2018.

We take your privacy very seriously. Have a look at what we're doing with your personal information and how we're keeping it secure.

We are fully committed to providing you with clear and transparent information about how we use your personal information. We value the trust you give us when sharing your personal information. We will ensure robust measures are in place to keep your information secure and will only use it for the purposes outlined in this Data Protection Privacy Notice.

### **About Scottish Gymnastics**

Scottish Gymnastics (SG) is a membership services organisation and the central body which governs the sport of Gymnastics in Scotland. They are an affiliated organisation of British Gymnastics who regulates the sport at UK level. You can view SG's privacy statement (<https://www.scottishgymnastics.org/privacy>).

### **Your online account**

All members (or their parents/guardians if members are under 16 years old) are required to have an online Scottish Gymnastics and British Gymnastics account which can be accessed at any time by logging in via the British Gymnastics website or via Gymnet (<https://www.british-gymnastics.org/gymnet/login>).

You can use this account to:

- Update personal contact details such as your address and phone number
- Renew or upgrade the BG membership type purchased (if asked by the club to do so).
- Update the information and preferences provided during the online membership process, such as the type of gymnastics you're involved in as well as medical information or emergency contact details.

It's important you keep your membership information online up-to-date.

### **This Data Protection Privacy Notice explains:**

- How and what personal information is collected
- How we use information for contractual purposes
- How we use information about you for legitimate purposes
- Other lawful reasons for using information about you
- Other processing activities
- Services provided by a third party supplier
- Why we share information about you
- Other reasons we share information about you
- Marketing
- Your rights in respect of your personal information

### **How and what personal information is collected?**

AGC operates a number of paper and IT systems which collect personal information:

Alloa Club Management System/ British Gymnastics Club / Excel spreadsheets

When you register as a new member or renew your membership online with Alloa Gymnastics Club / Scottish Gymnastics and British Gymnastics (or you register or renew on behalf of a child under the age of 16), AGC uses the necessary data you have provided as we need to collect and process information about you. Some of this information is essential for us to provide your membership but it is your choice whether you provide all the information we have requested. Not providing information may affect our ability to provide all the benefits of membership to you.

- Your name (and the name of the member if they are under 16) and preferred title.
- Date of birth and gender.
- Contact details and emergency contact details (telephone, email and postal address).
- Acceptance of Club rules, policy.
- Confirmation of the role(s) you undertake in the sport e.g. parent, gymnast, coach, judge, club manager and safeguarding officer.

We may also collect the following other information about you:

- Records of communications from, to or relating to you.
- Accident or incident reports.
- Details of gymnastics qualifications/awards you hold, training you have completed and Workforce Licence records (jointly with British Gymnastics).
- Details of PVG certification (if required based on your role).

#### **How we use your information for contractual purposes**

To provide the gymnastics activity you have requested, communicate with you about this activity, changes to our terms and conditions and to process payments.

#### **How we use information about you for legitimate purposes**

To meet the legitimate aims of the club and ensure your child is well supported and safe whilst participating in gymnastics.

Carrying out any relevant risk assessments:

- Some individuals may present with a medical condition that may be a risk of harm from participating in gymnastics. It is vital that you share any relevant medical information. We will ask for your agreement to undertake any appropriate assessments.

Identifying any reasonable adjustments and adaptations to support inclusion:

- If you or your child has a disability or any special needs, we will review the information you have provided to help us identify any actions we can take to support inclusion. We may need to ask you for more information to help us in this process.

Responding to any comments, questions or complaints you may send us.

Maintaining class attendance records and contact details for emergency purposes.

Film and take photos for coaching purposes and/or to promote the club on our website, club social media account and in communications. All film and photos of children will only be published in line with our safeguarding commitments.

AGC accept that the welfare and safety of children, young people and protected adults is the responsibility of everyone in the sport, whether paid staff or volunteer. We will endeavor to promote the highest standards of care for all. We are committed to ensure those working with these groups adopt best practice and that at all times no child, young person, protected adult is placed at risk of harm whilst participating in gymnastics activities.

You have the right to object to any of the above uses of your information. Please contact our Data Protection Officer at [dataprotection@alloagymnasticsclub.co.uk](mailto:dataprotection@alloagymnasticsclub.co.uk) if you wish to object, detailing the objection, reasons for this objection and what you wish us to do. Please note that in some cases, this may affect our ability to carry out the things we need to do for you to take part in gymnastics.

### **Other lawful reasons for using information about you**

We may need to process information about you to comply with a legal or statutory obligation. This includes but is not limited to:

- As part of our response to any accident or incident.
- Accounting, auditing, compliance and administration practices.
- To maintain records of amendments to consents and to create suppression lists to ensure people who object to processing are excluded from the relevant processing activity.

We may also need to use information about you relating to the above activities to exercise or defend legal claims.

### **Other processing activities**

We undertake some other activities and offer a range of additional services to members. We may need to collect additional information about you as part of these activities and services. They include:

- Competitions and events
- Performance programmes, camps and clinics
- Disability classification
- Coaching and judging qualifications
- Learning and development activities e.g. e-learning courses and team manager/leadership programmes and undergraduate/postgraduate degree courses
- Research including surveys, focus groups and interviews

Additional notices about the information about you that we collect and how we will use it will be provided to you at the point that you are invited to participate in, register for or access any of the above activities or services.

### **Services provided by a third party supplier**

AGC use PAYSUBSONLINE, an online club management system to collect and store the personal information we need about our members. We are the data controller and are responsible for how the information is used and this privacy notice explains why your personal information is collected, stored and used.

Although PAYSUBSONLINE provides the IT platform and is responsible for ensuring your information held is secure, they will not make use of your data for any other purpose. Please see PAYSUBSONLINE's Data Protection Notice at <https://paysubsonline.com/Privacy-Policy.aspx> (external link).

### **Why we share information about you**

We will not share your information with any other organisations except with your consent or in exceptional/emergency circumstances where we believe that the sharing of information about you is vital to protect you, your child or another person.

If you/your child want to enter a competition provided by an external organisation, we will, with your agreement, share the information required to enter the event, usually name, DOB and gender. Most competitions are large events and there are likely to be photographers and people filming.

### **Other reasons we share information about you**

We may also need to share limited personal information with the following organisations where it is necessary to provide the services you have requested or where we are required or authorised to do so by law.

### **Awarding body for SG qualifications**

If you register for a SG coaching course, the qualification is assessed by the Scottish Qualifications Authority (SQA) which is the external awarding body for coaching awards completed in Scotland. We will need to share your name, address, date of birth, gender and any special requirements with the awarding body. We will also need to share your information with the course tutor and assessor to administer your course and assessment.

### **Statutory/regulatory authorities and other organisations**

On occasion, it may be necessary to share information with bodies such as the Health & Safety Executive (HSE), Information Commissioner's Office (ICO), Disclosure Scotland and the Police or Social Services. We may also share information with other relevant organisations to safeguard children. Any information that is shared will be strictly limited to what is required to ensure children are protected from harm and will be carried out in accordance with the law and relevant government guidance.

### **Marketing**

With your consent, we may send you information by email about activities, products and opportunities that we think will be of interest to you.

If you agree to the above and later change your mind, you can opt out at any point. Please contact [info@alloagymnasticsclub.co.uk](mailto:info@alloagymnasticsclub.co.uk) if you have provided consent but now wish to withdraw your consent for marketing.

### **Retention**

We will retain your personal data only as necessary to provide the services to which you have subscribed. At your request or if you do not renew your membership within two years, unless you ask us not to, we will delete any information that we no longer have a legitimate reason to retain.

We need to retain sufficient information about you in the event of an insurance claim in the future so that we can identify you and confirm that you held membership for the relevant period. We may need to retain other information to comply with legal or statutory requirements. As the reason for retaining certain types of information varies, the retention periods can vary significantly. Please contact us directly if you require further information on specific retention periods.

## **Your rights**

### **The right to be informed:**

Your privacy is extremely important to AGC and we are fully committed to providing you with clear and transparent information about how we use your personal information in this privacy notice as we value the trust you give us when sharing your personal information.

### **The right of access:**

You have the right to see the personal information we hold about you. This is called a Data Subject Access Request (DSAR). You can log into your online account at any time to view the information Scottish and British Gymnastics hold about you on your membership account.

You can also request a copy of the personal information that AGC hold by contacting the Data Protection Officer at [dataprotection@alloagymnasticsclub.co.uk](mailto:dataprotection@alloagymnasticsclub.co.uk).

If we do hold information about you, we will:

- Describe the information we hold and tell you why we are holding it.
- Tell you who it could be shared with; and
- Provide you with a copy of the requested information in an easy-to-understand format.

### **The right to rectification**

If we do hold information about you, you can ask us to correct or amend any inaccurate or incomplete information by contacting us at [dataprotection@alloagymnasticsclub.co.uk](mailto:dataprotection@alloagymnasticsclub.co.uk).

You can also log in at any point to amend or delete information held in your membership account that has changed or is no longer accurate.

### **The right to erasure**

You have the right to request erasure of your personal data if you consider that there is no lawful reason for us to continue processing your personal data.

### **The right to restrict processing**

You have the right to request restriction of processing where you may ask us to suspend processing your personal data to establish its accuracy, to defend a legal claim, where we need to verify our legitimate interests or you require the data but we would otherwise delete it.

### **The right to object**

You have the right to object to our use of personal information about you if you feel that your legitimate interests outweigh those of AGC for us to continue processing your personal data.

### **Data Protection Officer**

If you want to request information about our privacy policy or have any questions or concerns about your personal data, you can email or write to us at:

Alloa Gymnastic Club, C/O The Wasp Centre, Clackmannan Road, Alloa, FK10 1RY, or  
dataprotection@alloagymnasticsclub.co.uk

**Changes to the privacy policy**

We keep our privacy notices under regular review. This privacy notice was last updated on 12<sup>th</sup> September 2018.