# SCOTTISH FENCING PRIVACY NOTICE – FOR MEMBERS



#### What we need

Scottish Fencing, the National Governing Body for fencing in Scotland and affiliated to British Fencing
Scottish Fencing will be a "controller" of the personal information that you provide to us through your membership application form, on our website and through the various media channels that Scottish Fencing utilises unless otherwise stated.

#### Members' personal data:

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

- contact details name, address, email address, date of birth contact telephone number;
- membership criteria / category, fencing region;
- payment details bank account number, sort code, card details;
- participation details for example: your club,
- equality information for example:, disability, ethnicity, gender; and
- other specific personal information that Scottish Fencing may request from time to time, for example, PVG membership number, IP address,

# 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 notices of Annual General Meetings, Competition Entries and Results,
   Voting rights at meetings,
- set up your online membership account;
- send you membership communications by post or email in relation to essential membership services, including but not limited to, Annual General Meeting notices, membership renewals, membership fee information.

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.

# 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 Fencing in Scotland by sending members communications and booking information
  for upcoming competitions and events. We may film our competitions and events for live streaming purposes and we may
  use your personal information in images captured from our competitions and events, which we use for promotional,
  education and development purposes;
- provide competition in Fencing in Scotland by accepting/managing entries for our competitions. Checking your personal information to ensure you are entered into the correct category;
- monitor and develop participation in Fencing in Scotland by monitoring members' engagement and participation through events and competitions and inviting our members to participate in surveys for researching and development purposes;
- invite our members as award winners or guests to our annual general meeting, which may in future include asking our
  clubs to nominate individuals forawards 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 / safeguarding requirements;
- respond to and communicate with members regarding your questions, comments, support needs or complaints, concerns or allegations in relation to Fencing in Scotland including Scottish Fencing's complaints and disciplinary procedures, for example, we will use your personal information to investigate your complaint, to suspend membership, take disciplinary action where necessary and relevant, and
- provide information regarding safety issues including for example issues relating to equipment

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

<u>admin@scottish-fencing.com</u> 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.

## 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 and performance athletes for the purposes of complying with our obligations under:

- the Companies Act 2006 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 specific volunteers and staff are able to undertake regulated work with children and vulnerable adults;
- our **sport**scotland regulatory requirements to have a clear understanding of the demographics of our membership base and 'de-personalised' data may be shared with **sport**scotland for measurement purposes;
- the Equality Act 2010, which requires us to process personal information to make reasonable adjustments where necessary;

## Why we need your personal information - equality monitoring requirements

We are required to use our members' personal information relating to your health, racial or ethnic origin, and other areas of 'protected characteristics' for equality monitoring purposes as required by **sport**scotland.]

We will process such personal information through aggregated and anonymised report to identify and keep under review the existence or absence of equality of opportunity or treatment between groups of people within the same categories to promote or maintain equality within our sport.

# Other uses of your personal information

We may ask you if we can process your personal information for additional purposes. For example, for members to receive Newsletters or specific promotional material. 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.

## Club members' personal data:

Our affiliated clubs may ask us to collect and store personal information about their individual members. Where we do this, the clubs have a responsibility as 'controllers' to provide their members with privacy notices and we will not use such personal information for any other purpose.

#### 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 **sport**scotland and British Fencing and other home nations 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 and Safety Executive, Volunteer Scotland Disclosure Services, Disclosure Scotland, and Police Scotland for the purposes of safeguarding children and reporting on any accidents or incidents leading to serious injury or death.

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

Scottish Fencing employs third party suppliers to provide services, including payroll and staff pensions. 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.

Scottish Fencing works with British Fencing to administer our membership database as part of which British Fencing contracts third party payment providers to process your payment on our behalf. British Fencing and its payment providers process our members' 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.

## How we protect your personal information

Your personal information is stored on our electronic filing system and our servers based in the UK, and is accessed by our paid staff and specific volunteers for the purposes set out above. If we are required to transfer your personal information

outwith the EU for the purposes of for example: entering athletes into competitions, booking travel arrangements for training camps, and so on, 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

#### 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 2 years.

We will keep certain personal information of members for longer in order to confirm your identity, when you were a member of Scottish Fencing 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 for an indefinite period or in the event of a claim against Scottish Fencing.

### Your rights

You can exercise any of the following rights by writing to us at admin@scottish-fencing.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 if you wish us to delete your personal information, you may request that we do so.

Scottish Fencing will consider any requests received 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