

## **Glasgow Schools Rowing Club SCIO, Charity Number SC047806, (GSRC) – Privacy Policy**

### **What we collect**

GSRC will be a “controller” of the personal information that you provide to us, unless otherwise stated.

When you register with GSRC, take out membership of GSRC 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 for rowers and parents/guardians and emergency contact details – name, address, email address, phone numbers, date of birth and occupation of parents/guardians;
- membership criteria / category – coach, rower or parent;
- equality information – disability (if any), ethnic group, gender identity;
- school information – which school a rower attends and which year group;
- health information – medical conditions, allergies, medication, disabilities; physician name and contact details;
- rowing numbers – Scottish and British rowing membership numbers.

We may also collect, use, store and transfer different kinds of personal data about our rowers and their parents/guardians and our other members and coaches which we have grouped together as follows:

- Identity Data - sportswear size and other measurements; insurance data, information about club membership and membership in sports bodies and associations, ability group, attendance history, competition results, any additional comments, notes or information about a rower's performance;
- Competition and time trial results.
- Background and criminal record/PVG checks results for the club workforce/volunteers, with consent.
- Financial Data - including bank account and payment card details.
- Transaction Data - including details about payments to and from you and other details of products and services you have purchased from us, and donations including gift aid.
- Technical Data includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website.
- Profile Data includes feedback and survey responses.
- Usage Data includes information about how you use our website and services.

### **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, coaching (for rowers);
- book and administer travel and accommodation;
- provide competition in the sport of Rowing by accepting and managing entries for competitions and checking your personal information to ensure you are entered into the correct category; and
- send you membership communications by post or email in relation to essential membership services, including but not limited to, events, membership renewals and information on membership benefits.

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**

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

- promote and encourage participation in the sport of Rowing by sending members and parents/guardians communications and booking information for upcoming competitions and events. Your personal information may also be used in images captured from training, camps, social events, competitions and other events, which we use for promotional, education and development purposes;

- monitor and develop participation in the sport of Rowing by monitoring members' engagement and participation through attendance;
- develop and maintain our members' progress in the sport of Rowing, including sending social media, text and email communications to members and parents/guardians to inform you of upcoming training, competitions and events, renewal requirements and verify that you have completed any mandatory training and any PVG / child protection requirements; and
- respond to and communicate with members and parents/guardians regarding your questions, comments, support needs or complaints, concerns or allegations in relation to GSRC or the sport of Rowing. We will use your personal information to investigate your complaint, to suspend membership and take disciplinary action where appropriate.

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 [membership@glasgowschoolsrowingclub.co.uk](mailto:membership@glasgowschoolsrowingclub.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.

### **Why we need your personal information – legal obligations**

We are under a legal obligation to process certain personal information relating to our members for the purposes of complying with our obligations under:

- the Scottish Charitable Incorporated Organisations Regulations 2011;
- the Equality Act 2010, which requires us to process personal information to make reasonable adjustments where necessary.

We also process your personal data for the purpose of defending and making legal claims, protecting GSRC's legal rights and detecting and preventing fraud or illegal activity.

### **Why we need your personal information – equality monitoring requirements**

We are required to use our members' personal information relating to your disability (if any), ethnic group, religious belief, gender identity and sexual orientation for equality monitoring purposes as required by Scottish Rowing.

We will process such personal information through aggregated and anonymised reports 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. 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 competitions and events, we may share this on social media and with The Glasgow Academy and journalists 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, HMRC and Police Scotland for the purposes of safeguarding children.

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

When you enter a competition run under the jurisdiction of another recognised governing body for rowing (e.g. Scottish Rowing or British Rowing) we may share your information with that body to enable them to manage your entry and check your personal information to ensure you are entered into the correct category.

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.

We may use the Scottish Rowing 'rowingentry' system to administer entries to competitions on our behalf. Scottish Rowing processes our members' personal information as a "data processor" and is subject to written contractual conditions to only process that personal information under our instructions and protect it.

In addition we share some personal information with The Glasgow Academy for administrative purposes and where our members are also members of The Glasgow Academy Rowing Club.

#### **How we protect your personal information**

We store your personal information using Dropbox, PCs, laptops and phones and in paper form (held securely). In addition, we limit access to your personal data to the club workforce/volunteers, committee members and other third parties who have a legitimate need to know.

#### **How long we keep your personal information**

By law we have to keep basic information about our paying members (including Contact, Identity, Financial and Transaction Data) for six years after they cease being paying members for tax purposes.

We will keep your personal information for as long as necessary to provide you with membership services and for a period after your membership ceases. You can ask for details of retention periods by contacting [membership@glasgowschoolsrowingclub.co.uk](mailto:membership@glasgowschoolsrowingclub.co.uk).

Unless you ask us not to, we will review and possibly delete some of your personal information where you have not renewed your membership with us for six years.

We will keep certain personal information of members for longer in order to confirm your identity, and rowing competition status.

#### **Your rights**

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

[membership@glasgowschoolsrowingclub.co.uk](mailto:membership@glasgowschoolsrowingclub.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 GSRC 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](http://www.ico.org.uk).

We may update this Privacy Policy from time to time. [Last updated 13 September 2019]