



sportscotland  
**Western Wildcats  
Hockey Club  
Privacy Notice**  
August 2019

## What we need

Founded in 1898, Western is the oldest existing hockey club in Scotland. We have a proud history and long tradition of success. Our club sides represent us in the regional and district leagues and we provide a platform for every level of ability and experience. We are a Gold Accredited club and affiliated with Scottish Hockey.

Western Wildcats Hockey Club ('Western') will be a "controller" of the personal information that you provide to us through the Club website.

### *Members' personal data:*

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

- contact details— name, address, email address, mobile number, date of birth;
- membership category – for example, senior, junior, non-playing;
- payment instructions – bank transfer, slate payment, cash;
- participation details – athlete, parent, guardian etc.

### *Volunteers' personal data:*

When you volunteer with Western, we may ask you for the following personal information:

- contact details – name, address, email address, mobile number;
- participation details – parent, guardian, committee member;
- PVG membership if applicable.

### *Participants personal data:*

When you book a place with Western to attend a camp, course or event we will ask you for the following personal information:

- contact details- name, address, email address, mobile number, date of birth;
- participation details – athlete, parent, guardian etc.;
- payment instructions – bank transfer, cash.

## **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 Scottish Hockey registration, insurance, licensing, voting, etc.;
- set up your membership account and maintain your selection to play in certain leagues or districts;
- send you membership communications by email in relation to essential membership services, including but not limited to general meeting notices, membership renewals, membership fees information, club events, Club newsletters.

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.

### *Participants' personal data:*

When you book a place with us to attend a coaching course, competition, event or training course, we need to collect your personal information so that we can honour your booking and to enable you to participate in the course, competition or event.

If you do not provide us with all of the personal information that we need to collect then this may affect our ability to book your place.

## **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 hockey by sending members' communications and booking information for upcoming competitions and events. Our competitions and events may be filmed or photographed and your personal information may also be used in images captured from our competitions and events, which we use for promotional, education and development purposes;
- provide competition in hockey by accepting and managing entries for hockey competitions and checking your personal information to ensure you are entered into the correct category;
- monitor and develop participation in hockey by monitoring members' engagement and participation through trends in membership and inviting our members to participate in surveys for researching and development purposes;

- invite our members as award winners or guests to our annual awards dinner, which includes asking our members to nominate individuals for awards 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 requirements;
- respond to and communicate with members regarding your questions, comments, support needs or complaints, concerns or allegations in relation to hockey. We will use your personal information to investigate your complaint, and if deemed necessary, to suspend your membership or take disciplinary action.

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 at [dp@westernwildcats.co.uk](mailto:dp@westernwildcats.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.

#### *Volunteers' personal data:*

We will need to collect personal information relating to criminal convictions or alleged commission of criminal offences where you are required to complete a PVG check under the Protection of Vulnerable Groups (Scotland) Act 2007. This information will include your PVG certificate number, PVG membership number, date of issue and any relevant information in relation to your membership of the PVG Scheme.

If your PVG certificate is not clear, we will have a legitimate interest to collect references and any other applicable information to allow us to consider whether or not you can volunteer in a regulated role with children and/or vulnerable adults.

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 at [dp@westernwildcats.co.uk](mailto:dp@westernwildcats.co.uk). If we comply with your objection, this may affect our ability to undertake the tasks above for the benefit of you as a volunteer.

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

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

- the Charities and Trustee Investment (Scotland) Act 2005 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 volunteers are able to undertake regulated work with children and vulnerable adults;
- our sportscotland regulatory requirements;
- the Equality Act 2010, which requires us to process personal information to make reasonable adjustments where necessary.

#### **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 our competitions and events, we may share this with Scottish Hockey 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, 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.

Western employs third party suppliers to provide services, including IT and payments management. 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.

#### *Members' personal data:*

As an affiliated club of Scottish Hockey we are required to ensure that all of our members are members of Scottish Hockey as a condition of our affiliation.

We will share members personal data to allow registration of members with Scottish Hockey who will become a controller of your personal information when they receive it. Scottish Hockey's privacy notice explains how they use your personal information and can be accessed at [www.scottish-hockey.org.uk/governance/privacy-policy/](http://www.scottish-hockey.org.uk/governance/privacy-policy/)

#### *Participants' personal data:*

We publish the results of our competitions on our website. This includes competitors' name, age and result.

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

Your personal information is stored on our electronic filing system and our servers based in the EU, and is accessed only by our committee members for the purposes set out above.

We may be required to transfer your personal information outwith the EU for the purposes of entering athletes into competitions, or booking travel arrangements for training camps or competitions. 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 3 years.

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

#### *Participants' personal data:*

We will only keep your personal information for as long as necessary to provide you with event/competition services. Unless you ask us not to, we will review and possibly delete your personal information after 3 years.

#### *Volunteers' personal data:*

We will only keep your personal information for as long as necessary to provide you with volunteer services. Unless you ask us not to, we will review and possibly delete your personal information after 3 years.

We have a data retention policy that sets out the periods for retaining and reviewing all information that we hold. This sets out different retention periods and you can request a copy by contacting us at [dp@westernwildcats.co.uk](mailto:dp@westernwildcats.co.uk).

### **Your rights**

You can exercise any of the following rights by writing to us at [dp@westernwildcats.co.uk](mailto:dp@westernwildcats.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 Western 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)