



Privacy notice for Salle Holyrood for existing or new members

Salle Holyrood takes your privacy seriously. We are a “controller” of the personal information that you provide to us and this privacy notice sets out how we will use your personal data, as well as who it is shared with. It also explains your legal rights as a data subject and how to exercise them. In this notice, references to ‘we’ and ‘us’ means Salle Holyrood.

What we need from you

When you register as a member of Salle Holyrood (including if you are registering on behalf of a young person aged 18 or under), we may ask you for some or all of the following personal information:

- Contact details – eg. name, address, email address and phone number.
- Date of birth – to calculate membership category and eligibility for events and courses.
- Payment details – bank account number, sort code, card details.
- Participation details – other clubs, existing British Fencing membership number.
- Equality information – sex, gender, disability, ethnic group and religion.
- Safety and emergency details – eg. next of kin, relevant health conditions.
- Relevant qualifications eg coaching and first aid certificates; PVG/child protection requirements.

If you do not provide us with all of the personal information that we need this may affect our ability to offer you our membership services and benefits. 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 admin@sallehoyrood.com. 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

Contractual purposes

We need to collect our members’ and customers’ personal information so that we can manage your membership. We may use our members’ personal information to:

- Provide you with core member services, including confirmation of membership, subscription information.
- Organise club activities and manage risk and safety if you attend training, lessons or events.
- Register your membership with the representative bodies, British Fencing and Scottish Fencing, to provide you with insurance cover, licensing, PVG checks, magazine subscription and other benefits they offer to members of clubs, including access to courses and competitions.
- 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.

Legitimate purposes

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

- Provide you with news and updates about the activity of the club, opportunities to get involved in club training, competitions, general meetings or other events.
- Raise awareness of the club’s activities by capturing photos, videos, or live streaming at events. We will use this for promotion, education and development purposes.
- 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 investigate your questions, comments, support needs, complaints, concerns or allegations.

Legal obligations

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

- The Protection of Vulnerable Groups (Scotland) Act 2007, which requires us to check that our coaches and volunteers are able to undertake regulated work with children and vulnerable adults.
- The Equality Act 2010, which requires us to process personal information to make reasonable adjustments where necessary.

Why we need your personal information – monitoring

We use aggregated and anonymised reports of our members' personal information for monitoring purposes, enabling us to evaluate and promote equality of opportunity within our sport and to meet the requirements of grant funding evaluation.

Other uses of your personal information

We may ask you if we can process your personal information for other purposes. Where we do so, we will provide you with an additional privacy notice explaining how we will use your information for these purposes.

Who we share your personal information with

If we register your membership with British Fencing we pass on your personal data and British Fencing become a controller of your personal data. Each Governing Body provides full details of how it uses your personal data in its own privacy notice and will not use it for any other purpose.

If you have any questions about the data that BF collects and the continuing privacy of your personal data when it is shared with British Fencing, please visit <http://britishfencing.com/privacy-statement/> or contact dataprotection@britishfencing.com. Scottish Fencing's privacy notice is at <http://scottish-fencing.co.uk>.

We may be required to share personal information with statutory or regulatory authorities to comply with statutory obligations. Such organisations include the Health & Safety Executive, Disclosure Scotland, and Police Scotland for the purposes of safeguarding children, and UK Anti-Doping for the purpose of eliminating doping in sport. We may also share personal information with professional and legal advisors for the purpose of obtaining advice.

Third party suppliers with access to members' personal data

Salle Holyrood may use third party suppliers to provide services. These suppliers may process personal data on our behalf as "processors" and are subject to contractual conditions to only process that personal information under our instructions and protect it.

In the event that we share personal information with external third parties, we only share such information strictly required for the specific purposes and take reasonable steps to ensure recipients shall only process the disclosed personal information in accordance with those purposes.

- Sport80Ltd. provide (British Fencing's) membership database.
- Royal Bank of Scotland process payment transactions securely on our behalf.
- Mailchimp distribute some of our email communications. Their servers are based in the US and they uphold the EU Privacy Shield to certify their data security.
- We are planning to trial a membership/club management system and this privacy statement will be updated accordingly when this is implemented.
- Instructors, coaches and event organisers receive details of training or competition participants.

How we protect your personal information

Your personal information is accessed by our [Membership Secretary, Treasurer, Welfare officer, Chair and Coaches only for the purposes set out above. Only the membership secretary and coaches have access to medical information. It is stored by our club in either a locked cupboard (paper records) or password protected computers. Some data (including photos taken at the club and at events) is held on Dropbox and can be accessed by committee members.

How long we keep your personal information

We 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 delete your personal information within 2 years of you ending your membership with us. Some information relating to reported accidents or injuries could be kept longer, until no longer potentially relevant.

You have a right to:

- Change your communication preferences or restrict the processing of your personal data for specific purposes.
- Request that we correct your personal data if you believe it is inaccurate or incomplete.
- Access the personal data that we hold about you through a “subject access request”.
- Request that we delete your personal information.

You can contact us at admin@salleholyrood.com. Any requests received by Salle Holyrood 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

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