

## **PRIVACY POLICY FOR SPORT ABERDEEN CUSTOMERS**

### **Last updated November 2018**

This Privacy Policy is designed to protect you, the customer or volunteer, by informing you how your personal information is collected, how we look after that information and with whom we share it.

This Privacy Policy informs customers and users about the collection, use, disclosure, transfer and storage of your data obtained at our venues, through the various services we offer and from our website.

This Privacy Policy relates to customer data processed and stored by Sport Aberdeen, which includes venues, programmes and associated administrative activities operated under the names of Aberdeen Snowsports, Active Ageing, Active Lifestyles, Active Schools, Active Workforce, Adventure Aberdeen, Aquatics Aberdeen, Be Active, Events, Fit 2 Care, Get active (Memberships), Golf Aberdeen, Gymnastics Aberdeen, Healthy Active Minds, Ice Aberdeen, Move More Aberdeen, Tennis Aberdeen, Looked after Project, Sports Education Courses, Sports Grants and Walk Aberdeen. It also includes data captured on our websites including [www.sportaberdeen.co.uk](http://www.sportaberdeen.co.uk) and [www.sportaberdeen.co.uk](http://www.sportaberdeen.co.uk). Our registered office is at Stronachs LLP, 28 Albyn Place, Aberdeen, AB10 1YL. Registered number SC0350981, Charity number SCO40973.

Sport Aberdeen is the “Data Controller” of the personal information that you provide to us, unless otherwise stated, and is registered with the Information Commissioner’s Office (Ref Z3565299).

Sport Aberdeen is committed to complying with the Data Protection Act 2018 and the Privacy and Electronic Communications (EC Directive) Regulations 2003.

### **Our Privacy Promise**

- We promise to collect, use and store your personal information in a safe and secure way;
- We promise to only use your personal data for the specific purposes stated;
- We promise to keep you informed about how we use your information and who we give it to.

### **What we need**

**When you Become a Sport Aberdeen customer** we may ask you for the following information (depending on the services used) to give you the best possible service:

- Contact details – name, address, email address and telephone / mobile numbers;
- Get active membership option and category, including proof of entitlement (A2L card, company name, partner name and student card);
- Proof of identity (passport, driving licence, household bill, bank statement, tax bill / notification of tax code, birth certificate or cheque book / bank card);
- Emergency contact details – name and contact number;
- Date of birth;
- Gender;
- Ethnicity;
- Religion;
- Photographic image;
- Medical conditions;
- Bank / building society account name, account number and branch sort code;
- Debit / credit card details – name, address, card number, card start date, card expiry date, issue no. and security no.;
- Nursery / School and year group;

- Qualifications;

Sport Aberdeen is required to identify a ‘lawful basis for processing’ your data. Sport Aberdeen has identified consent, contract, legal obligation and legitimate interest as the lawful basis, as set out below.

**Why we need personal information – *Consent – we will expressly ask your consent to collect and use this information***

When you buy a product or service from us you will be asked if you want to receive relevant information from us about the work of Sport Aberdeen in helping to keep the city active and the latest information on products, services and offers relevant to you.

We may photograph or film your image as you use our venues or take part in our activities and events. This personal information may be used for:

- Instructional /coaching purposes; and
- Promotional purposes.

We may use your personal information to provide you with general marketing information which links with our aims of promoting and encouraging participation in sport and physical activity, in particular:

- By sending members’ communications and booking information for future promotions, events and new initiatives;
- By sending members’ communication about health and wellbeing which may be of interest; and
- Use your participation information to support your ongoing participation and identify additional services which may be of interest to you.

**Our Marketing Promise**

You are always in control – you can choose how to receive information;

We will never bombard you with information;

We will never sell your data or share with others.

When we process your personal information using consent, you have the right to withdraw consent at any time. Please email [subjectaccessrequest@sportaberdeen.co.uk](mailto:subjectaccessrequest@sportaberdeen.co.uk) at any time or telephone 01224 507720 during normal office hours. Alternatively, you can click on the ‘unsubscribe’ link at the bottom of emails.

**Why we need personal information – *Contract – we need this information to fulfil a contract with you***

We need to collect personal information from you so that we can manage your membership / coached activity / holiday programmes. We will use our members’ / customers’ personal information to:

- Provide you with core member services, including access to our venues, activity programmes and coaching / instruction;
- Set up your online membership account and administer your account online, including payment arrangements;
- Provide you with access to on-line bookings for group exercise classes and bookable activities eg badminton or tennis courts;

- Provide you with access to the Home Portal for coached programmes to enable you to view progression, make payments and move classes;
- Send you membership / coached programmes communications by email, post or SMS in relation to essential membership services, including but not limited to your membership renewals, information on membership benefits, membership fees information and cancellation of classes / lessons.

If you do not provide us with the necessary personal information this may affect our ability to offer these membership services and benefits.

We also need to collect your personal information from you if you enrol on a training course so that we can manage your qualifications / training course place/s and programme.

- Develop and maintain your qualifications, including sending email communications to you to inform you of upcoming course, renewal requirements and verify that you have completed any mandatory training and PVG requirements;

If you make a Sport Grants application we also need to collect personal information from you so that we can process your sports grant application.

**Why we need personal information – Legitimate Interest - we have identified a business reason to use your personal data. We have conducted assessments to make sure that the benefits to you are equal to the benefits to us.**

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

- Respond to and communicate with members' / customers' regarding your enquiries, comments, support needs or complaints and concerns in relation to our products and services. We will use your personal information to investigate your complaint and provide a response to you;
- Monitoring members' engagement and participation through membership usage and inviting our members to participate in surveys for research and development purposes;
- We may take photographs or film our events and your personal information may be captured in this way, which we will use subsequently to publicise our business activities for promotional, educational and business development purposes;
- Use your personal data to provide you with the best possible service, including ensuring your safety in any activity or programme in which you take part;
- Use your anonymised data to help inform our future marketing strategies and to support business decisions;
- Use your anonymised data for the purposes of reporting participation figures and programme outcomes to our funding partners, including Aberdeen City Council, sportscotland, governing bodies of sport (NGB'S),
- Use your anonymised data for the purposes of research to support health-related research programmes of our funding partners;

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 [subjectaccessrequest@sportaberdeen.co.uk](mailto:subjectaccessrequest@sportaberdeen.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 personal information – Legal Obligation -we have a legal requirement to record certain information**

If you have an accident at one of our venues or whilst taking part on one of our programmes, in some circumstances we are under a legal obligation to report this to the Health and Safety Executive.

We may be required to share your personal information with statutory and regulatory authorities and organisations to comply with statutory obligations and for the purposes of safeguarding children and vulnerable adults. This includes Police Scotland and the Aberdeen City Health and Social Care Partnership.

**Why we need personal information – Special Category Data**

To help provide you with the best possible service we also collect your personal information relating to your ethnicity, religion and health and social care and with your specific consent and in our legitimate interest.

**When you Volunteer with us**

When you volunteer with us to help deliver our programmes and services we may ask you for some or all of the following information:

- Contact details – name, address, email address and telephone / mobile numbers;
- Proof of identity;
- Date of birth;
- Emergency contact details – name and contact number/s;
- Employment information, including professional memberships, references, work history;
- Referee
- Qualifications;
- PVG information.

Special categories of data may include:

- Religion;
- Ethnicity; and
- Health data.

**Why we need personal information – Legitimate Interest- we have identified a business reason to use your personal data. We have conducted assessments to make sure that the benefits to you are equal to the benefits to us.**

We have a legitimate interest in processing personal information relating to your contact details, age, qualifications and training to ensure that we can provide you with appropriate volunteering experiences, access to suitable training and development opportunities helping both you and us to provide the best possible services.

We have a legitimate interest in processing certain personal information relating to emergency contact details of a family member or friends for the purposes of contacting them in the event you have an accident or become seriously ill at work.

We may be required to process your personal information for establishing, exercising or defending legal claims.

### **Why we need personal information – Legal Obligation - we have a legal requirement to record certain information**

Where volunteers meet the relevant criteria for working with children, young people and vulnerable adults, we are also under a legal obligation to process certain personal information relating to our volunteers for the purposes of complying with the Protection of Vulnerable Groups (Scotland) Act 2010. This is to check that employees can undertake regulated work with children and vulnerable groups.

If you have an accident whilst volunteering, in some circumstances we are under a legal obligation to report this to the Health and Safety Executive.

### **Why we need personal information – Special Category Data**

To help provide you with the best possible service we also process your personal information relating to your ethnicity, religion and health with your specific consent and in our legitimate interest.

We may be required to process your personal information relating to your health / occupational health in order to assess your working capacity as a volunteer of Sport Aberdeen.

### **When you use our website**

Sport Aberdeen collects information about how you use sportaberdeen.co.uk via our website and the device(s) that you use to access this service. This includes collecting unique online identifiers such as IP addresses, which are numbers that uniquely identify a specific computer or other network device on the internet.

Cookies are small text files which are stored on your computer when you visit certain web pages. At Sport Aberdeen we use cookies to understand how our site is used which helps us to improve your overall online experience.

**Strictly necessary:** these cookies are essential for certain features of our website to work eg when you wish to make a payment for a booking, course or membership. These cookies do not record identifiable personal information and we do not need your consent to place these cookies on your device. Without these cookies some services you have asked for cannot be provided.

**Managing cookies:** if you'd prefer to restrict, block or delete cookies from Sport Aberdeen you can use your browser to do this. Each browser is different, so check the 'Help' menu of your particular browser to learn how to change your cookie preference. If you choose to disable all cookies, we cannot guarantee the performance of our website and some features may not work as expected.

**Links to other websites:** This privacy notice does not cover the links within this site linking to other websites. We'd encourage you to read the privacy statements on the other websites you visit.

### **Other uses of your personal information**

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

### **Who we share your personal information with**

We may be required to share your personal information with statutory or regulatory authorities and organisations to comply with statutory obligations, for example the Health and Safety Executive, Disclosure Scotland, Police Scotland and Aberdeen Health and Social Care Partnership for the purpose of safeguarding children and vulnerable adults.

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

We may also share personal information with our funding partners, Aberdeen City Council, Aberdeenshire Council, Moray Council, Macmillan, Dr Hellen Reith Trust and sportscotland, for the purpose of monitoring funded programme participation or grant allocation.

We may also share personal information with groups and organisations who work with us to deliver our programmes and services. These include Russell Anderson Foundation, Paths for All, Macmillan Cancer Support, ClubSport Aberdeen, Active Aberdeen Partnership, Aberdeen Snowsports Club, self-employed contractors, Leisure Force and Your PT for the purpose of fulfilling programme requirements.

We may also share anonymised data with Aberdeen City Health and Social Care Partnership.

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 do not sell your personal information

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

Your personal information is stored electronically and our servers are based in Aberdeen, UK, and is only accessed by authorised staff for the purposes set out above.

Where your personal information is transferred out with the EEA, we will provide you with information regarding the safeguards that we have in place with the recipient country to protect your personal information.

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

We will only keep your personal information for as long as necessary to provide you with our services. Unless you ask us not to, we will review and possibly delete your personal data where you have not used our services for 1 year.

We will keep certain personal information of members' / customers' for longer in order to confirm your identity, when you were a member / customer and for how long in the event of a claim against us. If you have had an accident we will keep your personal data for a period of 3 years from the date of the accident for adults and for 25 years from the date of birth for a child.

We will keep financial files relating to processing your personal information for 6 years. Where you have had a debt with us, personal information will be retained for 6 years after the debt has been paid off.

### **Changes to this privacy notice**

We will keep this privacy notice under regular review and we will place any updates here. At the start of this privacy notice, we will tell you when it was last updated.