



ALBURY COMMUNITY SPORTS HUB

FULL DATA PROTECTION POLICY

1 Introduction

This privacy and data policy (Privacy Policy) applies to Albury Community Sports Hub (ACSH). The Hub is an incorporated charity SC051926, and our address is at Albury Road, Aberdeen, AB11 6TN.

ACSH operates in partnership with Sport Aberdeen, registered with the Information Controller's Office (ICO), and as such is the "data controller" of information shared with us as we carry out our objectives. ACSH is responsible for personal information shared with us and as such is the "data processor" and takes responsibility for protecting personal data under Data Protection Regulations,

This Policy applies and has effect in respect to our website, any related services, and General Meetings under the Constitution. For the avoidance of doubt, this Policy does not apply to partners of the Hub or sports coaches with whom ACSH has an agreement.

If you have any questions or comments about this Policy, please contact us:

- by e-mail: enquiries@alburyhub.org.uk
- by post: Albury Road, Aberdeen, AB11 6TN

ACSH is committed to protecting and respecting your privacy. This Policy explains the basis on which personal information we collect from you will be processed by us or on our behalf. We will comply with all applicable data protection laws, including the Data Protection Act 2018, the UK General Data Protection Regulation (UK GDPR) and any other data protection legislation applicable in the UK from time to time.

Please read this Policy carefully as it contains important information about the following:

1. what information we may collect about you;
2. how we will use information we collect about you;
3. whether we will disclose your details to anyone else; and
4. your choices and rights regarding the personal information you have provided to us.

Please note that the services we provide may contain hyperlinks to services owned and operated by third parties (e.g. maps, local leagues, social media). These third-party services may have their own privacy policies and we recommend that you review them. They will govern the use of whatever personal information you provide or which is collected by cookies and other tracking technologies whilst using these services. We do not accept any responsibility or liability for the privacy practices of such third-party services and your use of these is at your own risk.

2 Information we may collect about you

To provide services to you, we collect and process the following information which may include your personal data. "Personal data" or "personal information" means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymised data).

When using ACSH's services, the following information may be collected from you:-

- First name, Last name (compulsory);
- E-mail address (compulsory);
- Mobile number (compulsory);
- Date of birth (compulsory);
- Gender (compulsory);
- Postcode (compulsory);
- Password (compulsory);
- Address (compulsory);
- Default emergency contact details: name and phone number (optional).

Information about you collected from third parties:-

When you access the Services via a third-party social media provider such as Facebook, Google, Microsoft or a sports governing body (egLTA), we may collect and store personal and non-personal information which is available on that third party social media provider, such as your name, its URL, your User ID, email address and gender information. We will also receive technical data in order to ensure the Services connect to the correct third-party account.

Information about you collected from correspondence and phone calls

If you contact us by email or post, we may collect your contact details and keep a record of that correspondence.

When you call us, we do not record conversations, but may collect and store your contact details. If you decide to leave a voicemail message, we may collect and store your contact details, but will delete the message after a playback.

Information about you collected from incidents

If you, your child or a person under your supervision is involved in an incident or an accident at the Hub, we will process the details and pass them to Sport Aberdeen. For the avoidance of doubt, in this instance Sport Aberdeen is a "data controller" and we are "data processor".

Website purchase information

When you purchase anything via our website, we use a third party payment system called Stripe which transacts all our payments. We have no access to your card payment information, but we will collect and store your name and email address.

In person purchase information

When you purchase anything via our volunteers, we use a third party payment system called Square which transacts all our payments. We have no access to your card payment information.

3 How we collect your personal information

We may collect personal information about users of the Hub in a number of different ways.

Directly from you - for example, through visiting our website, booking a resource (tennis court, bowling green, petanque court, putting green), booking a course or session (sports coaching), purchasing or renewing membership, booking an activity at an event.

From someone else acting on your behalf - for example, where a parent or guardian has purchased a membership or course for a child, where a member has chosen you as an emergency contact.

4 Our basis for processing personal data and the purposes for which we use it

The main purpose of processing personal information during the provision of the Service is to:

- process court or other resource bookings;
- process sports coaching sessions, course and programme bookings;
- process membership transactions;
- process event bookings;
- process community activities bookings;
- set up and process competition data;
- set up coaches or volunteers to run sports coaching and community programmes.

We have provided further detail on our lawful reason for processing your personal information below.

Performance of a contract

To perform the services, you have requested under the terms of our services agreed between us and other relevant agreements which you enter into from time to time.

Pursuit of legitimate interests

In some cases, we may use your personal information to pursue legitimate interests of our own including security, governance and those with a wider public benefit. Our principal legitimate interests are:

- to ensure network and information security of our Service;
- to pursue current membership holders to exercise their voting rights at general meetings under the terms of our constitution including, but not limited to election to the management committee;

For example, we need to process personal data in pursuit of our legitimate interests to:

- protect our website from abuse, stop bad bots, thwart DDoS attacks, and monitor for suspicious payloads and browser supply chain attacks;
- communicate announcements and agenda of general meetings;
- perform an identity check during general meetings;
- communicate minutes of general meetings;
- research and statistical analysis (e.g. to review participation patterns).

In all instances we will ensure your interests and fundamental rights do not override those interests.

Vital interests

Vital interest is a legal definition which relates to taking action where it is necessary to protect someone's life or that of another person.

This would normally mean providing details about a member, including their emergency contact details if provided, to a third party such as a member of the emergency services in the event of an accident at the Hub.

Consent

The Hub may also process your personal data on the basis of consent you give, for example:

- to send you email newsletters about past, current, and future developments including, but not limited to, news and announcements strictly related to the Hub;
- to send you surveys in relation to past, current, and future developments at the Hub including, but not limited to, surveys to inform our past and future management decisions.

If you do consent to receiving this information you can withdraw your consent at any time. To withdraw your consent, you can adjust the relevant control on the website. Website > Login > Your profile > [Your privacy and consents](#).

Compliance with our legal obligations

In some cases, the Hub needs to process your personal data in order to comply with its legal obligations. For example, we need to process personal data in order to comply with the health and safety regulations and assist with investigations by police and/or other competent authorities.

5 Children

Our Services do not knowingly solicit information from or market to children under the age of 18 unless we have express parental or guardian consent. Our terms of use prohibit users aged under 18 years from accessing our Services except on behalf of a parent or guardian. In the event that we learn that we have collected personal information from a child under 18 years of age without this consent we will delete that information as quickly as possible.

6 How we may use special categories of personal information

"Special categories" of sensitive personal data, such as medical information, requires higher levels of protection and further justification for collecting, storing and using this type of personal information.

We do not collect any sensitive data about you. Nor do we collect any information about your criminal convictions and offences.

7 Who we may share your data with

Personal information collected and processed by us may be shared with the following recipients, or categories of recipients, where necessary:

- we may disclose it to any volunteer of the Hub, suppliers or subcontractors insofar as it is reasonably necessary for the purposes set out in this Privacy Policy;
- someone acting on your behalf, for example a parent or guardian who has purchased membership, sports coaching course or programmes for you as their child;
- competition organisers and officials involved in competitions you are taking part in;
- your coach, activity leader for the purposes of membership, booking a court or other resource; coaching programme or activity group;
- our suppliers where they process data on our behalf. For example, membership platform providers, payment providers and email providers.
- we may disclose your information to the extent that we are required to do so by law (which may include to government bodies and law enforcement agencies); in connection with any legal proceedings or prospective legal proceedings; and in order to establish, exercise or defend our legal rights (including providing information to others for the purposes of fraud prevention).
- we may disclose your information to the extent that we are required to do so in pursuit of our legitimate interest (this is strictly limited to minutes of general meetings);

8 Services provided by other third parties

Sometimes third parties will use the Hub to deliver their own service. Where this takes place the third party will remain the controller of the data for the services that they provide. The data will not enter our systems unless the individuals that take part in these services also provide us with their personal data directly or already appear within our systems.

For these Services the third-party will be responsible for upholding and responding to the rights of individuals. Third parties that currently fall into this category are:

- Sport Aberdeen - www.sportaberdeen.co.uk/sport-aberdeen/privacy-policy
- Aberdeen Football Club Community Trust - www.afccommunitytrust.org/privacy/
- Dementia Friends - www.dementiafriends.org.uk/WEBArticle?page=privacy-policy#.ZDI3-bMJpg
- Aberdeen City Health & Social Care Partnership - www.aberdeencityhsc.scot/site-information/privacy-policy/
- Aberdeen and Crathes Croquet Club - www.crathescroquetclub.org.uk

9 Cookies

Information may be sent to your computer in the form of an internet “cookie” to allow servers of our suppliers to monitor your requirements. The cookie is stored on your computer. The servers may request that your computer return a cookie to it. These return cookies do not contain any information supplied by you or any personally identifiable information about you.

Such measures are necessary to allow us and our suppliers to measure the usability of the website and systems, which will help in its continuing development to ensure that we understand the requirements of our users.

You can control and manage cookies in various ways. Please keep in mind that removing or blocking cookies can negatively impact your user experience and parts of our website may no longer be fully accessible.

Most browsers automatically accept cookies, but you can choose whether or not to accept cookies through your browser controls, often found in your browser's "Tools" or "Preferences" menu. For more information on how to modify your browser settings or how to block, manage or filter cookies can be found in your browser's help file or through such sites as: www.allaboutcookies.org.

10 The period for which we will keep your information

We will only retain your personal information for as long as necessary to fulfil the purposes for which it was collected, including for the purposes of satisfying any legal, accounting or reporting requirements.

Where we are the data controller, to determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means and the applicable legal requirements. In some circumstances, we may anonymise your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you. More detail is given below for different categories of information.

We keep correspondence for up to seven years in case you contact us again about the same subject.

If you are a member, we keep your contact and identification details, usage and attendance details during your membership and for up to six years after it ends so we can respond in the event of any query about your membership.

If you are a member and attended general meetings under the constitution of the Hub, we keep minutes of such meetings for up to seven years. Personal information within these minutes is limited to name and surname only.

When you purchase anything via our website, we have no access to your card payment information, but we will keep your name and email address for up to seven years after the purchase.

11 Rights of access, correction, erasure, and restriction

You have the following rights over the way we process personal data relating to you. We aim to comply without undue delay.

To make a request, please let us know by contacting us with the details below.

- Request access to your personal information (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information and to check that we are lawfully processing it.

- Request correction of the personal information. This enables you to have any incomplete or inaccurate information we hold about you corrected. It is important that the personal information we hold about you is accurate and current. Please update your personal records for any changes on a timely basis.
- Object to the processing data about you. You can request the restriction, termination of processing or deletion of your personal data if:
 - you consented to other processing the personal data and have withdrawn that consent;
 - there is no longer a need to process that personal data for the reason it was collected;
 - the personal data is being processed because it is in the public interest or it is in order to pursue a legitimate interest of the Hub or a third party, you do not agree with that processing and there is no overriding legitimate interest in the continued processing;
 - the personal data was unlawfully processed;
 - you need the personal data to be deleted in order to comply with legal obligations;
 - the personal data is processed in relation to the offer of a service to a child.
- Obtain a machine readable copy of your personal data, which you can use with another service provider. Where it is technically feasible, you can ask us to send this information directly to another IT system provider if you prefer.

12 Data security

We will take all reasonable technical and organisational precautions to prevent the loss, misuse or alteration of your personal information.

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

Please be aware that, although we endeavour to provide reasonable security for information we process and maintain, no security system can prevent all potential security breaches.

13 Transferring of data internationally

Our information is generally stored within the UK or EEA on secure databases.

When we transfer your information outside of the EEA, normally because our suppliers or subcontractors are based outside of the EEA (for example, because your personal data is stored on an IT system hosted outside of the EEA), we ensure that any such transfer meets our legal requirements. You can obtain more details of the protection given to your personal data when it is transferred outside the UK or EEA by contacting us using the details below.

14 Contacts

If you have any questions about this privacy notice or how we handle your personal information, please contact us:

by e-mail: enquiries@alburyhub.org.uk

by post: Albury Road, Aberdeen, AB11 6TN

15 Make a complaint to a supervisory authority

If you are unhappy with the way we are processing your personal data, please let us know by contacting us.

If you do not agree with the way we have processed your data or responded to your concerns, an alternative is to submit a complaint to a Data Protection Supervisory Authority:

www.ico.org.uk

16 Changes to this privacy notice

We reserve the right to update this privacy notice at any time, and we will provide you with a new privacy notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.

If you have any questions about data protection or this privacy notice, please contact us.