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# sportscotland General Privacy Notice

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Putting sport first

**sportscotland**  
the national agency for sport

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V1: last updated 25 May 2018

## What is the purpose of this document?

**sportscotland** is committed to protecting the privacy and security of your personal information. This privacy notice describes how we collect and use personal information about you during and after you access our services, in accordance with the General Data Protection Regulation (**GDPR**). This Privacy Notice (together with any other privacy notice that we may provide to you) contains important information about how we collect, manage, use and protect your personal data.

This privacy notice is applicable to all visitors to our Websites (as outlined below), the customers of our National Centres at Cumbrae, Glenmore and Inverclyde (the National Centres), and individuals who otherwise come into contact with our services]. Please note that we have a specific Athlete Privacy Policy (at <https://sportscotland.org.uk/athleteprivacynotice>) for current and former athletes.

**sportscotland** of Doges, Templeton on the Green, 62 Templeton Street, Glasgow, G40 1DA will be a “controller” of the personal information that you provide to us and we are registered as a data controller with the Information Commissioner’s Office. This means that we are responsible for deciding how we hold and use personal information about you. We are required under the GDPR to notify you of the information contained in this privacy notice.

We may change this Privacy Notice from time to time. Please check this policy frequently to ensure you are aware of the most recent version and the date that it was last updated.

## Our websites

This privacy notice is applicable to the following websites associated with **sportscotland** along with any websites we may operate in the future (the “Websites”):

<https://.sportscotland.org.uk>

<https://sportfirst.sportscotland.org.uk>

<https://www.glenmorelodge.org.uk/>

<https://nationalcentreinverclyde.org.uk/>

<https://www.e-s-p.com/> (Inverclyde & Glenmore booking system)

<https://www.nationalcentrecumbrae.org.uk/>

<http://sshf.co.uk>

<https://mysport.sportscotland.org.uk>

<https://asmo.sportscotland.org.uk/>

<https://hubsmo.sportscotland.org.uk/>

[https://play.google.com/store/apps/details?id=uk.org.sportscotland.app&utm\\_source=global\\_co&utm\\_medium=prtnr&utm\\_content=Mar2515&utm\\_campaign=PartBadge&pcampaignid=MKT-Other-global-all-co-prtnr-py-PartBadge-Mar2515-1](https://play.google.com/store/apps/details?id=uk.org.sportscotland.app&utm_source=global_co&utm_medium=prtnr&utm_content=Mar2515&utm_campaign=PartBadge&pcampaignid=MKT-Other-global-all-co-prtnr-py-PartBadge-Mar2515-1)

<https://itunes.apple.com/gb/app/sportscotland/id1064457914?mt=8>

## Information we hold and collect

We may collect and process the following personal data about you:

- Information that you provide by filling in forms on the Websites or provide to the National Centres when using their services, including your name, address, email address, phone numbers, date of birth, gender, age, and financial and credit card information. This includes information provided at the time of registering to use our site, subscribing to our service, posting material or requesting further services. We may also ask you for information when you enter a competition or promotion sponsored by **sportscotland** and when you report a problem with our site.
- medical information, information relating to additional support needs and nutritional information required for certain courses or accommodation bookings at the National Centres
- Photos and videos during events where such photos constitute personal data, which would be taken only with your consent, such events being hosted at the National Centres.
- Correspondence with you (either via email, record of call, voicemail message or otherwise).
- Details of transactions you carry out through our site and of the fulfilment of your orders.
- Details of your visits to our site including, but not limited to, traffic data, location data, weblogs, other communication data and the resources that you access (see the Cookies section below for more information on this).
- Images of you may be taken by CCTV systems when you have attended some of our premises used by members of the public. These images are for the purposes of public and staff safety and crime prevention and detection. CCTV is also installed on the outside of some of our buildings for the purposes of monitoring building security and crime prevention and detection. Images saved by CCTV will not be stored in our systems longer than necessary.
- Any information that you choose to send us via email or social networking tools such as Twitter, Facebook and Instagram.
- Data input into our coaching app or into our online elearning courses.

## Cookies

A “cookie” is a text file that is downloaded to the hard drive of your computer and is used to remember your preferences and sessions.

We use this information to (anonymously) track movements through our sites, to find out how they are being used and inform our improvements. This information is shared with Google Analytics and may be shared with third parties who perform similar services. This information is fundamental to the

provision of website services. Personal information about you is not collected during the tracking process.

You can disable the cookies that we attach if your browser supports this. For further information on how to do this, please refer to [www.allaboutcookies.org](http://www.allaboutcookies.org). However, you should bear in mind that if you exercise this option, you may be unable to use some of our on-line services.

## How we use your information

When we are providing a service to you, we may use information held about you in the following ways:

- To administer the Websites.
- To ensure that content from our site is presented in the most effective manner for you and for your computer.
- To provide you with information, products or services that you request from us or which we feel may interest you, where you have consented to be contacted for such purposes.
- To allow you to participate in interactive features of our service, when you choose to do so.
- To notify you about changes to our service where we have consent to communicate with you via marketing.
- To book accommodation, book individuals onto training courses, and book individuals onto events.
- To hold and process medical and accessibility information in relation to course provision when required for the safety of course attendees, or process and store in respect of our gym and climbing wall facilities in the National Centres to allow safe provision of facilities.
- To pass nutritional information on to our catering providers in order for them to ensure dietary requirements are catered for. This includes third party away course accommodation providers.
- To process any accessibility information provided if relevant in order to ensure adequate facilities are provided for individuals.
- To process email addresses or other contact details to provide marketing or communications, request customer feedback only where individuals provide consent for us to carry out this type of activity.
- If you have given us consent to take photos/videos of you, we may share this on our websites, social media and **sportscotland** publications.
- In relation to our coaching application, we store your information and may download it for information to tailor push notifications to group and audiences
- In relation to our elearning modules, we may process your information to provide you with learning certificates, scoring information, or other certifications relating to elearning modules and may use this information for evaluations.
- In respect of workshops provided by ourselves or approved third parties, we may use your data in respect of workshop provision, delivery and tracking. Provide workshops for individuals and arrange sport educators to deliver such workshops, and track workshops that have been delivered.

## Our legal basis for processing your personal data

We use your personal information where we have a legal basis under applicable data protection legislation, where:

- we need to use your personal information to perform the contractual terms of your engagement with us, based on the contract governing your employment, service provision, internship, or voluntary service provision;
- we have legal obligations, which require us to process your personal data;
- we need to use your personal data to perform a task in the public interest; and/or
- in the case of the National Centres only, where we or a third party have a legal justifiable processing activity, which requires us or that third party to use your personal data only where there is no disadvantage to you.

## Why we need your personal information- general

We will only use your personal information when the law allows us to. Most commonly, we will use your personal information in the following circumstances:

- Where we need to perform the contract we have entered into with you;
- Where we need to comply with a legal obligation; and/or
- Where it is required in order for us to perform a task in the public interest.
- In the case of the National Centres only, where we are justified in doing so in terms of our legitimate interests

We may also use your personal information in the following situations, which are likely to be rare:

- Where we need to protect your vital interests (or someone else's interests) in a life threatening emergency.

## Who we share your information with

If your personal information is included in any images or videos taken by us at our events, where that photo or video constitutes personal data and we have consent to use such personal data, we may share this with Commonwealth Games Scotland, Scottish Governing Bodies, and British Governing Bodies of Sport, among others, for promotional/media purposes.

We may share your information with third parties where it is necessary to perform a contractual service or administer our relationship with you, where we are required by law to do so, (in the case of the National Centres only) where we have a legitimate interest in doing so), or when we are required by public interest requirements to do so.

**sportscotland** engages third-party suppliers to provide services including IT, payroll, contractors for training, occupational health services or specific pieces of work, among others. 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.

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

We may also share your information with third parties from time to time if that sharing is required in relation to the service we are providing to you, including, but not limited to:

- Third party software, analytics, website and search engine suppliers or IT suppliers including Google Analytics, Campaign Monitor, MailChimp, Crazy Egg, ESP, Ross Falconer Limited, Strut Digital

- Service providers in relation to courses and bookings you make with us including at the National Centres and for events or courses provided by our affiliates including Scottish and National Governing Bodies
- Reflex Blue, our coaching app provider, Survey Monkey, Onefile, Centrastor, all of which being suppliers of software required for course provision or communications.
- Scottish and National Governing Bodies, Scottish local authorities, the Scottish Qualifications Authority, clubs and other associations in respect of elearning or coaching applications, where the individual data subject would have knowledge of that information being shared.
- Finance/Payment software including WorldPay and Sagepay.

## How we protect your personal information

Where **sportscotland** retains your personal information in one of our own data centres, all data will be stored on UK based servers. Where **sportscotland** utilises cloud based storage, your data may be stored in additional European Union country data centres for resilience, which are also governed by the GDPR. Core systems are only accessible by **sportscotland** staff and a small number of contract for service practitioners.

Security measures in place within **sportscotland's** data centres include -

Physical security measures; Strong passwords; Password lock out policy; Managed permissions; Two factor authentication; Encryption; Antivirus software; Anti-malware software; Data loss prevention software; Secure Email Gateway; Software patch management; Appropriate data backup arrangements.

Your personal information may also be stored on third party, cloud based solutions. Where this is the case, **sportscotland** will ensure that that third party complies with the GDPR when processing your data.

Where your personal information is transferred out with 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.

Please be aware that data transmission over the internet is inherently insecure, and we cannot guarantee the security of data sent over the internet.

## How long we keep your personal information

We have a records management plan and retention and destruction schedule that sets out the periods for retaining and reviewing all information that we hold and is updated yearly. You can download this at <https://sportscotland.org.uk/freedom-of-information/foidocuments/records-management-plan/>.

## Your Rights

You can exercise any of the following rights by emailing SAR@sportscotland.org.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; and
- you have a limited right to request that we restrict the processing of your personal information for specific purposes in some instances. This right is dependent on whether **sportscotland** relied on consent to process your personal data originally, and this right is subject to restriction as outlined in the GDPR.

Any requests received by **sportscotland** 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).

### **Contact**

Questions, comments and requests regarding this privacy policy are welcomed and should be emailed to [DPO@sportscotland.org.uk](mailto:DPO@sportscotland.org.uk) or addressed to:

Data Protection Officer  
**sportscotland**  
Doges  
Templeton on the Green  
62 Templeton Street  
Glasgow  
G40 1DA