



## **Clachnacuddin Football Club – Privacy Statement**

We are committed to protecting and respecting your privacy in compliance with the General Data Protection Regulation (GDPR).

This privacy notice explains how we at Clachnacuddin FC look after personal information you provide us, whether as a player, supporter or sponsor. It also explains about marketing communications you agree we may send you.

This notice explains how we do this and tells you about your privacy rights and how the law protects your personal information.

### **Why we collect your personal data:**

We only process your personal data where we have a lawful basis to do so, which will include one or more of the following:

- that we have your consent (if consent is needed), for example to send you marketing emails
- that we need to use the personal data to perform a contract with you, for example as a team member or where you have ordered a product or service from us
- for the administration purposes of Clachnacuddin Football Club

### **What personal information we collect about you:**

We collect information about you when you become part of our team, join our supporters trust, for sales of our services such as tickets, hospitality, Lily Lottery, provide sponsorship or donations to the club.

The personal information we will collect may include:

- Personal contact details such as name, title, address, telephone numbers and personal email addresses
- Date of Birth
- Gender
- Next of kin and emergency contact information
- National Insurance number
- Bank Account details, payroll records and tax status information
- Salary



- Employment records (including working hours, training records and professional memberships).
- Disciplinary and/or grievance information
- Photographs

We may also collect, store and use the following sensitive personal information for our team members, coaches, volunteers only with your express permission:

- Information about your health, including any medical condition, health and sickness records.
- Information about criminal convictions and offences.

We will not hold personal information for anyone under 16 years without the explicit consent of their parents.

#### **How we will use your personal information:**

In line with GDPR we will use your personal information to fulfil our contract with you as a player, coach, volunteer, sponsor or advertiser with the Club, as member of our Lily Lotto, or supporter. In addition we may use your personal information to:

- facilitate internal administration and record keeping
- provide you with products and services you request (such as tickets, hospitality and merchandise)
- to answer your enquiries which may involve contacting you by post, e-mail or phone
- to administer competitions or promotions that you enter into
- to process payments that you make
- to notify you of changes to this Privacy Notice, our terms and conditions or other changes to our services or products
- to send you marketing information – we will only do this with your consent
- to give you the opportunity to provide us with feedback through reviews and surveys

#### **Sharing your personal data:**

If required to do so we may pass on your Personal Data to government or regulatory authorities or law enforcement officials to assist with their requests and comply with our legal obligations.



We may also share your personal data with other football clubs and the football authorities to comply with any football regulations or any investigations in relation to incidents at our matches.

We have a data sharing agreement with the Scottish Football Association in relation to child protection which complies with GDPR.

We will not pass on your Personal Data to any third party to market their products/services to you unless we have obtained your consent.

### **Sharing personal data outside of the EEA**

We do not share personal information outside of the European Economic Area (EEA). However, should we be required to share personal information with e.g. FIFA outside the EEA for the purposes of organised football trips or tournaments, we will take appropriate steps to ensure that your information is protected in accordance with this privacy notice.

### **Marketing:**

We don't undertake direct marketing. However, we may in the future like to contact you to tell you more about offers, services or products available to you.

We will ask for your consent to receive marketing information. However, if you are an existing customer (and have not opted out) we may contact you by email about services, products and initiatives similar to those you have previously received or enquired about.

You have the right at any time to stop us from contacting you for marketing purposes. If you no longer wish to be contacted for marketing purposes, please contact us.

### **How long we will keep your personal information for:**

We keep your personal data for as long as is required to fulfil our contract with you.

- We keep player information until their contract expires
- We keep personal information in relation to the Supporters Trust information for a year, until annual renewals are due and issued.



### **Security of your personal information:**

All personal information is held securely in an alarmed office with access limited to authorised Clachnacuddin FC personnel.

Paper records are stored in a restricted locked cabinet within a secured room and building.

Electronic records are encrypted and password protected.

Following the specified retention periods noted above, paper records will be disposed in confidential waste and the electronic records will be deleted.

### **Access to your personal information and correction:**

We want to make sure that your personal information is accurate and up-to-date. You can ask us to correct or remove information you think is inaccurate.

You have a right to a copy of your personal information and the right to ask us to delete, remove or stop using your personal information if there is no need for us to keep it. We will not charge for accessing your personal data.

The person with responsibility for data protection is the club secretary and can be contacted as below:

Email us at [clachnaccuddin@highlandleague.com](mailto:clachnaccuddin@highlandleague.com) or in writing to

Clachnacuddin Football Club  
Grant Street Park  
Wyvis Place  
Inverness  
IV3 6DR

More information on GDPR and your rights is available from the Information Commissioner's website: <https://ico.org.uk/>



## **Clachnacuddin Football Club – Data Protection Policy**

### **1. Introduction**

We are committed to protecting and respecting your privacy in compliance with the Data Protection legislation. The latest legislation comprises of the EU General Data Protection Regulation (GDPR) and the Data Protection Act 2018 (DPA), which replaced the UK's Data Protection Act 1998.

We consider the lawful protection of personal data as a critical responsibility that is taken seriously at all times.

### **2. Purpose of the Policy**

We need to collect and use information about individuals with whom we deal in order to operate including players, supporter and sponsors.

This policy will ensure that personal data processed by Clachnacuddin FC (the Club) will be done so in a fair and lawful manner.

### **3. Scope and Responsibilities**

This policy applies to all personal data processed by the Club regardless of how that data is stored, and applies to all Committee members, coaching staff and volunteers who have access to, or process personal information.

The Club Secretary has responsibility for has overall responsibility for the implementation and compliance of the policy, ensuring that all within the club.

All members of the Committee, club officials, and coaching staff, including volunteers are required to read and ensure they understand and comply with this policy and any related procedures. Where required, training appropriate to an individual's role to enable that person to comply with data protection legislation will be provided.

### **4. Definitions**

#### Personal Data

Any information identifying an individual or information relating to an individual that can be identified (directly or indirectly) from that data alone or in combination with other identifiers.

#### Data Subject

An identified or identifiable individual about whom we hold Personal Data.



### Processing Personal Data

Any activity that involves the use of Personal Data. It includes obtaining, recording or holding the data, or carrying out any operation or set of operations on the data including organising, amending, retrieving, using, disclosing, erasing or destroying it. Processing also includes transmitting or transferring Personal Data to third parties.

### Sensitive Personal Data

Information revealing racial or ethnic origin, political opinions, religious or similar beliefs, trade union membership, physical or mental health conditions, sexual life, sexual orientation, biometric or genetic data, and Personal Data relating to criminal offences and convictions.

## **5. Types of Data Held**

Personal data is held primarily for enabling organisational processes and the running of the Club. In general terms this will be:

- Personal contact details such as name, title, address, telephone numbers and personal email addresses
- Date of Birth
- Gender
- Next of kin and emergency contact information
- National Insurance number
- Bank Account details, payroll records and tax status information
- Salary
- Employment records (including working hours, training records and professional memberships).
- Disciplinary and/or grievance information
- Photographs

We may also collect, store and use the following sensitive personal information for our team members, coaches, volunteers only with your express permission:

- Information about your health, including any medical condition, health and sickness records.
- Information about criminal convictions and offences.



## **6. Personal Data Protection Principles**

### Lawfulness and Fairness

Data may only be collected by the Club if the Processing is fair, lawful and for specified purposes, including:

- the data subject has given his or her consent;
- the processing is necessary for the performance of a contract with the Data Subject;
- to meet legal compliance obligations;

### Consent

In some circumstances consent may be required. Consent should be freely given, specific and informed. It may also be withdrawn at any time.

### Transparency

Information in relation to how and why the Club collects data will be provided through appropriate Privacy Statements.

### Purpose

Personal Data will be collected only for specified, explicit and legitimate purposes. It will not be further processed in any manner incompatible with those purposes. Personal Data will not be processed for new, different or incompatible purposes from that disclosed when it was first obtained unless the Data Subject has been informed and has consented where necessary.

### Data Minimisation

Personal Data will be adequate, relevant and limited to what is necessary in relation to the purposes for which it is processed. When Personal Data is no longer needed, it will be deleted in a confidential manner.

### Accuracy

The Association will ensure that the Personal Data used and held is accurate, complete, kept up to date and relevant to the purpose for which it is collected. The Association will take all reasonable steps to destroy or amend inaccurate or out-of-date Personal Data.

### Storage Limitation

Shall not be kept longer than is necessary for the specific purpose it is processed.



### Security Integrity and Confidentiality

Personal Data will be secured by appropriate technical and organisational measures against unauthorised or unlawful Processing, and against accidental loss, destruction or damage.

All Committee members, officials, coaches and volunteers must follow all procedures and technologies put in place to maintain the security of all Personal Data from the point of collection to the point of destruction.

### Reporting a Personal Data Breach

Whilst the Club will take every care to protect personal data and to avoid a data protection breach, in the unlikely event of data being lost or shared inappropriately, the Club will take appropriate action to minimise any associated risk as soon as possible.

The GDPR and Data Protection Act 2018 require notification of any Personal Data Breach to the applicable regulator, and, in certain instances, the Data Subject.

Any suspected Personal Data Breach and will be notified to Data Subjects or any applicable regulator where legally required to do so within 72 hours.

If you know or suspect that a Personal Data Breach has occurred, you should contact the Club Secretary.

### Transfer Limitation

The Club will not share personal information outside of the European Economic Area (EEA). However, should we be required to share personal information with e.g. FIFA outside the EEA for the purposes of organised football trips or tournaments, we will take appropriate steps to ensure that personal data is protected in accordance within data protection legislation.

## **7. Data Subject's Rights and Requests**

Data Subjects have certain rights when it comes to how their Personal Data is handled.

These include rights to:

- withdraw consent to processing
- request access to the Personal Data that is held (a data subject access request)
- ask for erasure of Personal Data if it is no longer required for the purpose for which it was collected or processed





- rectify inaccurate data
- complete incomplete data
- restrict processing in specific circumstances
- challenge processing which has been justified on the basis of the Association's legitimate interests or in the public interest
- prevent processing that is likely to cause damage or distress to the Data Subject or anyone else
- be notified of a personal data breach which is likely to result in high risk to a person's rights and freedoms
- Make a complaint to the supervisory authority.

You must immediately forward any Data Subject Access request you make or receive to the Club Secretary.

## **8. Sharing Personal Data**

The Club will only share Personal Data with third parties where data sharing agreements complying with data protection legislation are in place, or where required comply with legal obligations.

## **9. Contact Information**

Any questions in relation to this policy, or data subject access requests should be addressed to:

The Secretary  
Clachnacuddin Football Club  
Grant Street Park  
Wyvis Place  
Inverness  
IV3 6DR

[clachnacuddin@highlandleague.com](mailto:clachnacuddin@highlandleague.com)

Further information on data protection legislation can be found at the website for the Information Commissioner: <https://ico.org.uk/>