



# KELSO RFC

## PRIVACY & GDPR POLICY

**ONECLUB**

**ONECOMMUNITY**

***HISTORY IS OUR STRENGTH....***

Kelso Rugby Football Club  
Poynder Park, Poynder Place  
Kelso  
TD5 7EH



## **Policy Statement**

Kelso Rugby Football Club ("the Club") is a data controller and processor for the purposes of the General Data Protection Regulation ("the GDPR") and the Data Protection Act 2018. The Club management committee have responsibility for matters in relation to the GDPR.

This Privacy and GDPR Policy explains how the club will collect and store personal data, the legal, contractual and legitimate reasons it needs to collect data and how any requests or complains about the collection, use or holding of data can be raised.

## **Why we are providing this notice to you**

The Club holds certain information (personal data) about you which is required to operate the Club as a legal entity and as an organisation belonging to its members. We are required by law to give you certain information about your personal data, how we use it and what safeguards are in place to ensure it is protected. This notice gives you that information.

Personal data held by us will be:

- Used lawfully, fairly and in a transparent manner.
- Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those
- Relevant and limited only to the purposes we have
- Accurate and kept up to date (members will be asked to confirm details remain the same at the point of annual membership renewal)
- Retained for only as long as is necessary for the purposes
- Kept securely.

## **The type of personal data we hold**

The Club may require to hold and process the following types of data: -

- Contact details – name, address, telephone number, email address;
- Type of membership;
- Correspondence and documents relevant to your membership, duties with or interest in the Club;
- Bank details (where a direct debit is to be set up or payment being received into the clubs bank account by the member);
- Dietary requirements (junior, adult playing member, attendees at formal club events where food is being provided);
- Contact details for parents or guardians (Junior members only);
- Medical information (Junior and adult playing members only);
- Date of birth (Junior and adult playing members only);

- Your image (if filmed or recorded when attending our sites or events); and
- Any other personal information you provide to us when contacting or corresponding with us, when requesting any products and services from us, when providing any products and services to us, when entering into or performing any contract with us, when signing up to, attending or participating in our events, competitions, or matches, or when entering our promotions.

It is your responsibility to check and ensure that all the personal information you provide to us is correct, complete, accurate and not misleading. If you become aware that any of the personal information you have provided to us or that we hold about you is out of date or is otherwise inaccurate, please contact us using the details set out at the end of this Privacy and GDPR Policy.

If you are providing personal information on behalf of any other person, you must ensure that you have that person's permission to do so and for their personal information to be processed in accordance with this Privacy and GDPR Policy.

We may monitor or record your telephone conversations with us for security purposes and to improve the quality of products and services on offer to you.

Please note that CCTV is in operation at our premises, matches and events for safety, security and crime prevention purposes.

Please also note that filming and photography takes place at certain of our matches, competitions and events. By attending any match, competition or event, you agree to your image being filmed, photographed or recorded at that match, competition or event and grant your permission, free of charge, for both Kelso RFC and its licensees to use such images in pictures and/or films (including publication on the internet and in social media).

### **Why we need the information**

The Club require to hold personal information to meet their contractual and legal obligations. The collection of personal information is necessary in order to properly facilitate and manage your membership of the Club. Information collected will only be used for the following purposes:

- to manage, develop, promote and administer matches, competitions, events and the sport of rugby union;
- to administer and complete any request that you make of us, for example to provide any product or service that you have requested from us (and to keep in contact with you for such purposes);
- to enable us to administer and provide any of our competitions, events or other offers/promotions that you have entered or are taking steps to enter with us (and to keep in contact with you for such purposes);
- to manage, understand and respect your preferences;
- to improve the products and services we offer;
- to obtain feedback on our website or on our events, competitions, products and services;



- for record keeping, research, monitoring and analysis purposes;
- to keep you informed of any changes to our website;
- to help diagnose server problems and administer our website;
- for the purposes of the performance of any contract that you have entered into or are taking steps to enter into with us (and to keep in contact with you for such purposes);
- to set up and administer any of your online accounts with us;
- to keep you informed via mail, email, social media, SMS or telephone about other offers,

events, products and services offered by us, or our sponsors or partners, that may be of interest to you and to personalise and/or tailor any such communications (only if you have agreed to be contacted in this way and subject to your ability to withdraw this agreement at any time); and

- to comply with applicable laws or regulations, court orders, law enforcement and fraud prevention requirements.

We may ask you from time to time if we can collect, hold and use your personal information for other purposes. If we do so, we will provide you with any necessary information on how we will use your personal information for such additional purposes.

The Club have several legal obligations to meet which makes the collection of some personal data essential. This can be both for compliance with company law and SRU regulations but also in relation to child protection and safeguarding legislation via the Disclosure Scotland membership scheme.

Personal information collected by the Club will only be done so where it is necessary to meet a legitimate interest. The Club have identified the following as the legitimate interests for collecting your personal data: -

- The promotion of club meetings, events and activities;
- The promotion of rugby as directed by the Scottish Rugby Union;
- To allow relevant police checks to be undertaken via the Disclosure Scotland programme (applies to members and volunteers working with children and young people only); and
- To allow communication with members regarding queries or complaints in relation to the Club and its rules and policies. Personal information may need to be collected in such circumstance to allow in query or complaint to be reviewed and investigated.

Anyone who is asked for the personal data in relation to the legitimate reasons does have the right to object. However, members should be aware that objection may mean that not all member services can be provided fully. In relation to volunteer coaches or those who require a Disclosure Scotland check, refusing to provide information may mean that you cannot volunteer with the Club.

In the event the Club require to collect personal data for any other purpose, additional Information on how your privacy will be maintained will be provided.

## **Sharing your data**

In some circumstances it will be necessary for the Club to share personal data with third parties. This sharing of data will only take place where to not to do would prevent or hinder the Club from carrying out its duties and/or from complying with a legal obligation. Those that we may share your personal data with include:

- Legal advisers
- Club accountant and bank
- Disclosure Scotland (junior members and those who work or volunteer with junior members only)
- Scottish Rugby Union

If we share your personal information with third-parties, they will be “processors” and subject to written conditions to only process your personal information in accordance with our instructions and to protect it. We will only share your personal information with third-parties if we are required to do so for specific purposes and will take reasonable steps to ensure that recipients only process the disclosed personal information in accordance with those purposes.

## **Protecting your data**

All personal information will be held within the United Kingdom within password encrypted digital records or club email servers.

Where personal information is collected in hard copy paper format, the information provided will be transferred onto the club’s digital records and the hard copy paper information destroyed within 28 days.

## **How long do we retain data**

The Club will only retain personal data for as long as is necessary to fulfil the legitimate purposes for which it was collected and to allow any complaints or queries relating to our administration of the Club. In some circumstances data may be held for a longer period where there is a legal requirement to do so.

## **Your rights**

You have a right of access and a right to obtain a copy of the personal data the Club holds about you by making a “subject access request” to the Club. Where there is incorrect information held, you have a right to ask for the personal data held to be corrected.

In certain circumstances, you have a right to ask the Club to restrict the processing of your personal data, to object to processing or to transfer or erase your personal data.

You only have a right to see the data we hold regarding you and we cannot provide you with the personal data of any other member or volunteer of the Club.

If you require to exercise the above rights or have a complaint in relation to the Club’s handling of your personal data, this should be made in writing to the President of the Club or by email to



[president@kelsorfc.co.uk](mailto:president@kelsorfc.co.uk). Additionally, a formal complaint can be lodged with the Information Commissioners Office.

### Updating your personal information

Where you wish to update your personal information or correct any information stored on the Club's records, such a request should be made in writing to:

Club Administrator  
Kelso RFC  
Poynder Park  
Kelso  
TD5 7EH

[president@kelsorfc.co.uk](mailto:president@kelsorfc.co.uk)

### Updates

From time to time the Club may require updating this policy. Any updates will be communicated to members appropriately.

<b>Approved by</b>	<b>Management Committee of Kelso RFC and ratified at Club AGM.</b>
<b>Date of Approval</b>	<b>4<sup>th</sup> August 2021</b>
<b>Next Review Date</b>	<b>4<sup>th</sup> August 2022.</b>