

PRIVACY NOTICE

What we need

The Camanachd Association is the World Governing Body for Shinty. The Camanachd Association will be a “controller” of the personal information that you provide to us in registration forms and we will manage this information through our online membership provider and our website provider.

Members’ personal data:

When you register as a member of the Camanachd Association or renew your membership (including if you are registering or renewing on behalf of a child under the age of [under 18]), we will ask you for the following personal information:

- contact details – name, address, email address, date of birth
- Type of Member – for example, player, committee member, official or coach (other)
- payment details – bank account number, sort code, card details
- participation details – for example, club
- equality information – for example, disability and gender
- PVG membership.

Why we need your personal information – contractual purposes

Members’ personal data:

We need to collect our members’ personal information so that we can manage your membership in line with the sport. We will use our members’ personal information to:

- provide you with core member services, including insurance and voting services (for member clubs and associations)
- set up your club’s online membership account
- send you membership communications by post or email in relation to essential membership services, [including but not limited to, general meeting notices, membership renewals, membership fees’ information]

If you do not provide us with all of the personal information that we need to collect then this may affect our ability to offer the above membership services and benefits.

Why we need your personal information – legitimate purposes

Members’ personal data:

We also process our members’ personal information in pursuit of our legitimate interests to:

- promote and encourage participation in Shinty by sending members’ communications and booking information for upcoming competitions and events. Our competitions and events may be filmed for live streaming purposes and your personal information may also be used in images captured from our competitions and events, which we use for promotional, education and development purposes;
- provide competition in shinty by accepting and managing entries for our competitions and checking your personal information to ensure you are entered into the correct category



CAMANACHD
ASSOCIATION
COMANN NA CAMANACHD
THE GOVERNING
BODY FOR SHINTY

SCOTLAND’S MOST ICONIC TEAM SPORT

- monitor and develop participation in shinty by monitoring members' engagement and participation through analysis of online data and inviting our members to participate in surveys for researching and development purposes
- invite our members as award winners or guests to our annual awards [dinner / ceremony], which includes asking our clubs to nominate individuals for awards and shortlisting such individuals to select the winners, who we will then contact by email
- develop and maintain our members' qualifications, including sending email communications to members to inform you of upcoming courses, renewal requirements and verify that you have completed any mandatory training and PVG / child protection requirements
- respond to and communicate with members regarding your questions, comments, support needs or complaints, concerns or allegations in relation to shinty. Complaints or disciplinary procedures can be found online at www.shinty.com and for example, we will use your personal information to investigate any complaint and take appropriate action as determined by our rules and byelaws

Participants personal data:

When you book a place with us to attend a coaching course, competition, event, training course, we need to collect your personal information so that we can honour your booking and to enable you to participate in the course, competition or event.

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 admin@shinty.com. If we comply with your objection, this may affect our ability to undertake the tasks above for the benefit of you as a participant.

Volunteers' personal data:

We will need to collect personal information relating to criminal convictions or alleged commission of criminal offences where you are required to complete a PVG check under the Protection of Vulnerable Groups (Scotland) Act 2007. This information will include your PVG certificate number, PVG membership number, date of issue and any relevant information in relation to your membership of the PVG Scheme.

If your PVG certificate is not clear, we will have a legitimate interest to collect references and any other applicable information to allow us to consider whether or not you can volunteer in a regulated role with children and/or vulnerable adults.

Collecting Personal information: Right to object

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 [\[admin@shinty.com\]](mailto:admin@shinty.com). If we comply with your objection, this may affect our ability to undertake the tasks above for the benefit of you as a volunteer, participant, coach or official.

Why we need your personal information – legal obligations

We are under a legal obligation to process certain personal information relating to our members, volunteers and participants for the purposes of complying with our obligations under:



CAMANACHD
ASSOCIATION
COMANN NA CAMANACHD
THE GOVERNING
BODY FOR SHINTY

SCOTLAND'S MOST ICONIC TEAM SPORT

- the Companies Act 2006 to maintain a register of our members, which includes our members' name, address, the date they were admitted to membership and the date on which they ceased to be our member, and hold general meetings, including issuing notices and voting arrangements;
- the Protection of Vulnerable Groups (Scotland) Act 2007 to check that our coaches and volunteers are able to undertake regulated work with children and vulnerable adults
- our sportscotland regulatory requirements to feedback anonymized data as condition of grant funding to monitor club trends - Personal data is processed securely, updated regularly and accurately, is limited to what the sport's needs. It is used only for the purpose for which it is collected and used of marketing purposes if the individual has given the us consent to do so.
- the Equality Act 2010, which requires us to process personal information to make reasonable adjustments where necessary

Why we need your personal information – equality monitoring requirements

We are required to use our members personal information relating to your health, racial or ethnic origin for equality monitoring purposes as required by sportscotland.

We will process such personal information through aggregated and anonymised reports to identify and keep under review the existence or absence of equality of opportunity or treatment between groups of people within the same categories to promote or maintain equality within our sport.

Other uses of your personal information

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

Club members' personal data:

We may be asked by our member clubs to collect and store personal information about their individual members. Where we do this, the clubs have a responsibility as "controllers" to provide their members with privacy notices and we will not use such personal information for any other purpose.

Who we share your personal information with

- If your personal information is included in any images or videos taken by us at our competitions and events, we may share this with local and national press, social media streams and other local and national partners for promotional and/or journalistic purposes.
- We may be required to share personal information with statutory or regulatory authorities and organisations to comply with statutory obligations. Such organisations including the Health & Safety Executive, Disclosure Scotland, and Police Scotland for the purposes of safeguarding children.
- We may also share personal information with our professional and legal advisors for the purposes of taking advice.

The Camanachd Association employs third party suppliers to provide services, including IT, payroll, membership services, journalistic purposes and website provision. 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.

Commented [DK1]: Do we need a contract with our member clubs and associations to agree the conditions around our management of personal member data?



CAMANACHD
ASSOCIATION
COMANN NA CAMANACHD
THE GOVERNING
BODY FOR SHINTY

SCOTLAND'S MOST ICONIC TEAM SPORT

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.



CAMANACHD
ASSOCIATION
COMANN NA CAMANACHD
THE GOVERNING
BODY FOR SHINTY

SCOTLAND'S MOST ICONIC TEAM SPORT

Members' personal data

The Camanachd Association employs Azolve to administer our membership database, Virtuous IT to administer our IT, Dynam to maintain and host our website and sportscotland to manage our payroll. As part of which Azolve contracts third party payment providers to process your payments of our behalf. Azolve and its payment providers process our members' 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.

Club members' personal data

Member clubs of the Camanachd Association are required to ensure that all of their club members are members of the Camanachd Association as a condition of their membership.

Participants' personal data

We publish the results of our competitions on our website. This includes competitors' [name, age, result]. We may also be required to share personal information relating to members health in order to undertake activities to eliminate doping, at a sporting event, within our sport generally, or to provide information about doping, or suspected doping, to UK Anti-Doping or another body with responsibility for eliminating doping in our sport.

How we protect your personal information

Your personal information is stored on our electronic filing system and our servers are based in the UK, and is accessed by our staff for the purposes set out above.

On occasion we may be required to transfer your personal information out with the EU for the purposes of booking travel arrangements for training camps. 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.

How long we keep your personal information

Members' personal data

We will only keep your personal information for as long as necessary to provide you with membership services. Unless you ask us not to, we will review and possibly delete your personal information where you have not renewed your membership with us for 5 years.

We will keep certain personal information of members for longer in order to confirm your identity, when you were a member of the Camanachd Association and for how long. We need to do this to comply with the Companies Act 2006, which requires us to keep a register of members or in the event of a claim against the Camanachd Association.

Commented [DK2]: What is the appropriate amount of time to retain membership information if at all?

Your rights

You can exercise any of the following rights by writing to us at [4 Ballifeary Road, Inverness, IV3 5PJ] or by emailing admin@shinty.com or by logging on to your account at Azolve.

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;
- you have a right to request that we restrict the processing of your personal information for specific purposes; and
- if you wish us to delete your personal information, you may request that we do so.



CAMANACHD
ASSOCIATION
COMANN NA CAMANACHD
THE GOVERNING
BODY FOR SHINTY

SCOTLAND'S MOST ICONIC TEAM SPORT

Any requests received by the Camanachd Association 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



CAMANACHD
ASSOCIATION
COMANN NA CAMANACHD
THE GOVERNING
BODY FOR SHINTY

SCOTLAND'S MOST ICONIC TEAM SPORT