



The Edinburgh Academical Football Club

PRIVACY POLICY

This Privacy Notice describes how the Edinburgh Academical Football Club (also referred to us “the Club”, “we”, “us” or “EAFC”) collects, stores, and processes personal data we handle in relation to our members, players, coaches, medical, physio and S&C team, referees, volunteers, and EAFC Lottery members, in order to manage the various relationships. Wherever we have said “you” or “your”, this means you, any authorised persons (eg trustees or executors, attorneys under a Power of Attorney) and other related people (including authorised signatories, partners, members and trustees).

This Privacy Notice provides further detail on what information EAFC, in its role as a “Data Controller”, collects about you, how we will use that information, who we will share it with, the circumstances when we will share it, and what steps we will take to make sure it stays private and secure.

EAFC REGISTRATION

If you register as a member of EAFC or renew your membership (including if you are registering or renewing on behalf of a child), we may ask you for the following personal information:

- Personal contact details including name, address, postcode, date of birth, email address, contact numbers, gender
- Membership criteria/category
- Permission from parent/guardian of a junior member to participate in photographs and videos used to publicise rugby events

If you are a volunteer of EAFC we may ask you for the following personal information as required and relevant to your role:

- Contact details including name, address, postcode, email address, contact numbers
- Any other personal information relevant to your involvement, ie PVG membership

If you join the EAFC Lottery, we will ask you for the following personal information:

- Personal contact details including name, address, postcode and email address
- Lottery payment amounts

HOW WE USE YOUR INFORMATION AND THE LEGAL BASIS FOR THIS USE

We process this personal data for the following purposes:

- To fulfill a contract, or take steps linked to a contract - this is relevant where you make a payment for your membership. This includes:
 - Taking payments
 - Communicating with you
 - Providing and arranging the delivery or other provision of products or services

- As required by the Club to conduct our business and pursue our legitimate interests, in particular to:
 - Manage and administer your membership and your involvement with its teams and club, and to keep in contact with you for these purposes.
 - Promote and encourage participation by sending members' communications and booking information for upcoming competitions and events. Our competitions and events may be filmed or photographed 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.
 - Manage entries for our competitions and checking your personal information to ensure you are entered into the correct category.
 - Monitor and develop participation by monitoring members' engagement and participation and inviting our members to participate in surveys for researching and development purposes.
 - 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.
 - 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.
 - To investigate complaints, to suspend membership, take disciplinary action, etc.
 - To maintain records of our performances and history, including match reports, score lines and team sheets, and details of any disciplinary issues you may be involved in on and off the pitch, such as within health and safety records.

- 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 administration@edinburghaccies.com. If we agree and comply with your objection, this may affect our ability to undertake the tasks above for the benefit of you as a member or a volunteer.

- Where you give us consent:
 - We will provide you with core member services, keeping you informed and up to date.
 - We will 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, etc.
 - We may handle medical (including injury) information you, or your parent if you are a child, provides to us, to ensure we support you appropriately.
 - On other occasions where we ask you for consent, we will use the data for the purpose

that we explain at that time.

- For purposes that are required by law:
 - 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.
 - Where you hold a role at the Club requiring us to check your right to work, we may process information to meet our statutory duties.
 - 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.
 - The Equality Act 2010 - to process personal information to make reasonable adjustments where necessary.
 - We maintain records such as health and safety records and accounting records in order to meet specific legal requirements.
 - We may respond to requests by government or law enforcement authorities conducting an investigation.

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 our member base, followers on social media (Facebook, Twitter and Instagram), Scottish Rugby and rugby teams, at a minimum, for promotional and/or journalism purposes.

Players and Participants

Personal data including name, age, etc may be published for any player and participant biographies on our website, in newsletters or match programmes.

Some limited information may be shared with other stakeholders in rugby, such as Scottish Rugby, other clubs, Constituent Bodies, referee societies, league organisers, so that they can maintain appropriate records and assist us in organising matches; regulating, developing and managing the game; maintaining statistics; conducting analysis; ensuring compliance; and communication.

E AFC may also share personal data with Scottish Rugby through Scottish Rugby's Registration System (SCRUMS) and for other purposes such as PVG, insurance, disciplinary matters, etc.

We will retain information held to maintain statutory records in line with appropriate statutory requirements or guidance. We may be required to share personal information with statutory or regulatory authorities and organisations to comply with statutory obligations. Such organisations include Companies House, 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.

E AFC employs third party suppliers to provide services, including IT, payroll, etc. 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. 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.

Data may also be shared with any relevant third parties to allow for the progression of tour-related organisational activities and this information may be shared internationally depending on the planned tour location.

INFORMATION RECEIVED FROM THIRD PARTIES

Sometimes, we receive information about you from third parties. For example, if you are a child, we may be given information about you by your parents.

We may receive information relating to your existing registrations with other clubs or rugby bodies or disciplinary history from Scottish Rugby. Additionally, for certain role holders or those working with children, we may receive information from Disclosure Scotland and Scottish Rugby on the status of any PVG check you have been required to take.

PROTECTING YOUR PERSONAL INFORMATION

Your personal information may be stored manually and/or electronically. Access to personal information is limited to those of our staff or volunteers with a relevant need relating to the purposes set out above. Paper files are stored securely in a locked filing cabinet with access strictly limited to the relevant personnel. Electronic files, which are password protected as necessary, are stored securely, either on our computer system or in cloud-based (internet-hosted) system. In the latter case, we have selected trusted service providers because they are able to provide secure services that we are unable to deliver within our own resources.

RETAINING YOUR PERSONAL INFORMATION

We will only keep your personal information for as long as necessary to provide you with membership services.

We will keep certain personal information of members for longer in order to confirm your identity, when you were a member of E AFC 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 E AFC.

We keep our players’ personal data for a period of six years.

We have a data retention policy that sets out the periods for retaining and reviewing all information that we hold. This sets out different retention periods and you can request a copy by contacting us at administration@edinburghaccies.com.

YOUR RIGHTS

You can exercise any of the following rights by writing to us at:

The Edinburgh Academical Football Club
Portgower Place
Edinburgh
EH4 1HQ

Email:
administration@edinburghaccies.com

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” (SAR).
- 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.
- If you wish us to delete your personal information, you may request that we do so.
- You have the right to ask us for a copy of your personal data; to correct, delete or restrict (stop any active) processing of your personal data; and to obtain the personal data you provide to us for a contract or with your consent in a reasonable format.
- In addition, you can object to the processing of your personal data in some circumstances (in particular, where we do not have to process the data to meet a contractual or other legal requirement, or where we are using the data for direct marketing).

These rights may be limited, for example if fulfilling your request would reveal personal data about another person, or if you ask us to delete information which we are required by law to keep or have compelling legitimate interests in keeping.

Any requests received by EAFC 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.

This privacy notice may be updated from time to time, as required, in order to comply with any changes to data protection laws.