



# The Scottish Surfing Federation

## Privacy Notice

**Purpose:**

The purpose of this document is confirm the data handling requirements on obligations for the Scottish Surfing Federation.

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| <b>Document Number:</b> | <b>SSF_PP_01</b> |
| <b>Revision:</b>        | <b>01</b>        |

| REVISION HISTORY |             |                                 |            |
|------------------|-------------|---------------------------------|------------|
| Revision         | Prepared By | Status                          | Date       |
| 01               | P. Stark    | Draft prepared for Board Review | 25-07-2024 |
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## **Privacy Notice**

The Scottish Surfing Federation (SSF) will be a “controller” of the personal information that you provide to us on our online membership system (known as JustGo), unless otherwise stated.

When you register as a member of the SSF or renew your membership (including if you are registering or renewing on behalf of a child under the age of 16), we will ask you for the following personal information:

- contact details – name, address, email address (for children under 16 this is the email address of the parent), and date of birth
- membership category – individual, junior and honorary
- equality information – disability (if any), ethnic group, religious belief, gender identity and sexual orientation

### **Why we need your personal information – contractual purposes**

We need to collect our members’ personal information so that we can manage your membership.

We will use our members’ personal information to:

- provide you with core member services, including event access and membership benefits
- set up your online membership account and administer your account online
- send you membership communications by post or email in relation to essential membership services, including but not limited to, membership renewals and information on membership benefits

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**

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

- promote and encourage participation in surfing disciplines 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 surfing disciplines by accepting and managing entries for our competitions and checking your personal information to ensure you are entered into the correct category
- monitor and develop participation in surfing disciplines by monitoring members’ engagement and participation through attendance and inviting our members to participate in surveys for researching and development purposes
- 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 safeguarding requirements
- respond to and communicate with members regarding your questions, comments, support needs or complaints, concerns or allegations in relation to surfing disciplines. We will use

your personal information to investigate your complaint, to suspend membership and take disciplinary action where appropriate

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 at [info@thessf.scot](mailto:info@thessf.scot). 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.

### **Why we need your personal information – legal obligations**

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

- 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
- our **sportscotland** regulatory requirements to report on the size, achievements and profile of our members
- 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 disability (if any), ethnic group, religious belief, gender identity and sexual orientation 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.

We may be asked by our member clubs or affiliated university surf 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 members of the Scottish media, sponsors, **sportscotland** and Sports Partners (including Scottish Leisure Trusts, Scottish Local Authorities, Surf Clubs, Scottish Disability Sport, Scottish Universities) 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 include 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.

In the event that we do share personal information with external third parties, we will only share such personal information as is 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.

The SSF contracts JustGo to administer our membership database, as part of which JustGo contracts third party payment providers to process your payments of our behalf. JustGo 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.

### **How we protect your personal information**

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

### **How long we keep your personal information**

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 six years.

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

### **Your rights**

You can exercise any of the following rights by writing to us at [info@thessf.scot](mailto:info@thessf.scot) or by logging on to your JustGo account.

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
- if you wish us to delete your personal information, you may request that we do so

Any requests received by the SSF 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)