



West of Scotland FC Data Protection Policy

1. West of Scotland Football Club (WoS FC) considers that protecting your information is very important and recognises that you have an interest in how we may collect, use and share such information regarding data protection and the rights of Club Members, Visitors and Employees in respect of their personal data under the General Data Protection Regulation (GDPR). This policy sets out our commitment to protecting personal data and how we implement that commitment with regard to the collection and use of the personal data.
2. We are committed to:
 - a. Ensuring that we comply with the nine data protection principles, as listed below at Para 3.
 - b. Meeting our legal obligations as laid down by the Data Protection Act 1998 and by the General Data Protection Regulation May 2018.
 - c. Ensuring that data is collected and used fairly and lawfully.
 - d. Processing personal data only in order to meet our operational needs or fulfil legal requirements.
 - e. Taking steps to ensure that personal data is up to date and accurate.
 - f. Establishing appropriate retention periods for personal data.
 - g. Ensuring that data subjects' rights can be appropriately exercised.
 - h. Providing adequate security measures to protect personal data.
 - i. Ensuring that a nominated officer is responsible for data protection compliance and provides a point of contact for all data protection issues.
 - j. Ensuring that all club officers are made aware of good practice in data protection.
 - k. Providing adequate training for all staff responsible for personal data.
 - l. Ensuring that everyone handling personal data knows where to find further guidance.
 - m. Ensuring that queries about data protection, internal and external to the organisation, are dealt with effectively and promptly.
 - n. Regularly reviewing data protection procedures and guidelines within the club.

3. The Club's Data Protection Principles:

- a. It is processed lawfully, fairly and in a transparent manner in relation to individuals.
- b. Collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes.
- c. Is adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.
- d. Is accurate and, where necessary, kept up to date.
- e. Kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed.
- f. Processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.
- g. Ensure that all club officers are made aware of good practice in data protection and provide adequate training for all staff responsible for personal data.
- h. Ensure that queries about data protection, internal and external to the Club are dealt with effectively and promptly.
- i. Regularly review data protection procedures and guidelines within the club.

4. Summary of how we use your data.

- a. WoS FC holds information about players/parents in order to manage the Clubs activities including recruitment, registration, playing rugby, training, and to be able to provide contact/information with regard to the off field activities of WoS FC and its sections.
- b. Information is passed between sections of WoS FC for operational reasons (for example, the Registration Secretary notifies changes of address to the relevant coaches, managers, Treasurers and others on a 'need to know' basis).
- c. Information may be disclosed to external agencies to which the Club has affiliations; for example: The SRU –Player Registration known as the SCRUMS Management System. This information will only be disclosed to further playing, training or other associated reason.
- d. Information regarding health or medication is held by WoS FC in the best interests of the player and to assist coaches/managers to take appropriate steps in the event of injury. This information will not be passed on to third parties.
- e. We also keep data of those who have asked to be on our database for the purposes of keeping you in touch through the Club Newsletter and events at the club which may be of interest to members and non-members alike.

5. Club Staff and Volunteers. We also process personal data relating to those we employ to work at, or otherwise engage to work at, our club, in both a paid or voluntary capacity. This is for employment purposes, to assist in the running of the club and/or to enable individuals to be paid. This personal data includes identifiers such as name, gender, date of birth, contact details and, where we have to check your eligibility or ability to work for us, your National Insurance number. We may also require characteristics such as ethnic group, employment contracts, remuneration details and qualifications.
6. We will only collect and use your personal information (as described above) in accordance with data protection laws. Our grounds for processing your personal information are as follows:
 - a. Consent – Where necessary we will only collect and process your personal information if you have consented for us to do so. For example, when you register as a player, we ask for the player’s relevant medical details.
 - b. Legitimate Interests – We may use and process some of your personal information where we have sensible and legitimate business grounds for doing so. Under European privacy laws there is a concept of "legitimate interests" as a justification for processing your personal information. Our legitimate interests for processing your personal information are to enable you to access and use SCRUMS, your engagement with the club and about player welfare, discipline, rugby matters, or events/news which we think you may be interested in.
7. The Club shall ensure that all its employees, agents, contractors, or other parties working on its behalf comply with the following when working with personal data.
 - a. All documents containing personal data must be pass word protected.
 - b. Where any personal data is to be erased or otherwise disposed of for any reason (including where copies have been made and are no longer needed), it should be securely deleted and disposed of. Hardcopies should be shredded, and electronic copies should be deleted securely.
 - c. Personal data may be transmitted over secure networks only; transmission over unsecured networks is not permitted in any circumstances;
 - d. Where Personal data is to be transferred in hardcopy form it should be passed directly to the recipient.
 - e. No personal data may be shared informally.
 - f. All hardcopies of personal data, along with any electronic copies stored on physical, removable media should be stored securely in a locked box, drawer, cabinet or similar.
 - g. No personal data may be transferred to any employees, agents, contractors, or other parties, whether such parties are working on behalf of the Club or not, without the authorisation of the Hon Secretary.
 - h. Personal data must be handled with care at all times and should not be left unattended or on view to unauthorised employees, agents, sub-contractors or other parties at any time.

- i. If personal data is being viewed on a computer screen and the computer in question is to be left unattended for any period of time, the user must lock the computer and screen before leaving it.
 - j. All electronic copies of personal data should be stored securely using passwords and data encryption (where available for banking and financial transmissions).
 - k. All passwords used to protect personal data should be changed regularly and should not use words or phrases that can be easily guessed or otherwise compromised. Under no circumstances should any passwords be written down or shared between any employees, agents, contractors, or other parties working on behalf of the Club, irrespective of seniority or department. If a password is forgotten, it must be reset using the applicable method
8. How long will the Club retain your data? On resignation from the Club, your personal data records will normally be retained for up to 6 years. The records may be retained beyond this retention timeframe in the event of legal actions (or potential legal actions) against the Club, or if a court order is received requiring the Club to retain a members data, or in the event that the member has outstanding subscriptions when leaving.
9. What further rights do I have? 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. In addition, you can object to the processing of your personal data in some circumstances (in particular, where we don't 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.
10. If you have any concerns about how we process your data, you can get in touch with the Club by writing to The Hon Sec, WoS FC, Burnbrae, Glasgow Road, Milngavie G62 6HX.
11. More general information on the GDPR is available from the Information Commissioners Office website - www.ico.org.uk.