



DEVELOPING A NATION OF CYCLISTS

PARIN

Cairngorm CC DATA USE POLICY

We are committed to respecting your privacy. This notice is to explain how we may use personal information we collect before, during and after your membership with us. This notice applies to you/your child (*delete as appropriate*) if you have registered yourself/them (*delete as appropriate*) to become or are a member of our club. This notice explains how we comply with the law on data protection, what your rights are and for the purposes of data protection we will be the controller of any of your personal information.

References to **we**, **our** or **us** in this privacy notice are to Cairngorm CC.

We have not appointed a Data Protection Officer to oversee our compliance with data protection laws (as we are not required to do so), but our Secretary has overall responsibility for data protection compliance in our club. Contact details are set out in the "Contacting us" section at the end of this privacy notice.

1. PERSONAL INFORMATION WE MAY COLLECT FROM YOU/YOUR CHILD (*delete as appropriate*)

Depending on the type of membership you register for with us, you may initially provide us with or we may obtain **personal information** about you, such as information regarding your:

- personal contact details that allows us to contact you directly such as name, email addresses and telephone numbers;
- date of birth;
- gender;
- records of your interactions with us such as telephone conversations, emails and other correspondence and your instructions to us;
- records of your attendance at any events hosted by us;
- images in video and/or photographic form and voice recordings;
- your marketing preferences so that we know whether and how we should contact you.
- details of any governing body membership
- details of next of kin, family members, coaches and emergency contacts;
- records and assessment of any player rankings, grading or ratings, competition results, details regarding events attended

2. WHERE WE COLLECT YOUR INFORMATION

We collect personal information about our members when you apply to become a member of the club.

3. USES MADE OF THE INFORMATION

The table below describes the main purposes for which we process your personal information, the categories of your information involved and our lawful basis for being able to do this.

| Purpose | Personal information used | Lawful basis |
|---|---|---|
| To administer any membership you/your child (<i>delete as appropriate</i>) has with us and managing our relationship with you, including dealing with payments and any support, service or product enquiries made by you | All contact and membership details, transaction and payment information, records of your interactions with us, and marketing preferences. | This is necessary to enable us to properly manage and administer you/your child's (<i>delete as appropriate</i>) membership contract with us. |



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PARTNERSHIP

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|---|---|--|
| <p>To send you information which is included within you/your child's (delete as appropriate) membership benefits package, including details about competitions and events, partner offers and discounts and any updates on Cycling in general.</p> | <p>Contact and membership details.</p> | <p>This is necessary to enable us to properly manage and administer your membership contract with us.</p> |
| <p>To send you other marketing information we think you might find useful or which you have requested from us, including our newsletters, information about membership, events, products and information about our commercial partners</p> | <p>Contact details and marketing preferences.</p> | <p>Where you have given us your explicit consent to do so.</p> |
| <p>To answer your queries or complaints</p> | <p>Contact details and records of your interactions with us</p> | <p>We have a legitimate interest to provide complaint handling services to you in case there are any issues with your membership.</p> |
| <p>Retention of records</p> | <p>All the personal information we collect.</p> | <p>We have a legitimate interest in retaining records whilst they may be required in relation to complaints or claims. We need to retain records in order to properly administer and manage your membership and run our club and in some cases we may have legal or regulatory obligations to retain records.</p> |
| <p>The security of our IT systems</p> | <p>Your usage of our IT systems and online portals.</p> | <p>We have a legitimate interest to ensure that our IT systems are secure.</p> |
| <p>For the purposes of promoting the club, our events and membership packages.</p> | <p>Images in video and/or photographic form.</p> | <p>Where you have given us your explicit consent to do so.</p> |
| <p>To comply with health and safety requirements</p> | <p>Records of attendance</p> | <p>We have a legal obligation and a legitimate interest to provide you/your child (delete as appropriate) with a safe environment in which to participate in sport.</p> |
| <p>To administer your attendance at any courses or programmes you sign up to</p> | <p>All contact and membership details, transaction and payment data. Details of any SGB membership.</p> | <p>This is necessary to enable us to register you on to and properly manage and administer your attendance on the course and/or programme.</p> |
| <p>To arrange for any trip or transportation to and from an event</p> | <p>Identification documents details of next of kin, family members and emergency contacts, transaction and payment information, health and medical information.</p> | <p>This is necessary to enable us to make the necessary arrangements for the trip and/or transportation to an event. We process special category personal data on the basis of the "special category reasons for processing of your personal data" referred to in sec/on 2 above. Note the potential need to obtain consent</p> |



For some of your personal information you will have a legal, contractual or other requirement or obligation to provide us with your personal information. If you do not provide us with the requested personal information we may not be able to admit you/your child (*delete as appropriate*) as a member or we may not be able to properly perform our contract with you or comply with legal obligations and we may have to terminate your membership. For other personal information you may not be under an obligation to provide it to us, but if you do not provide it then we may not be able to properly perform our contract with you.

Where you have given us your consent to use your personal information in a particular manner, you have the right to withdraw this consent at any time, which you may do by contacting us as described in the "Contacting us" section below.

Please note however that the withdrawal of your consent will not affect any use of the data made before you withdrew your consent and we may still be entitled to hold and process the relevant personal information to the extent that we are entitled to do so on bases other than your consent. Withdrawing consent may also have the same effects as not providing the information in the first place, for example we may no longer be able to provide certain member benefits to you.

4. DIRECT MARKETING

Email and SMS marketing: from time to time, we may contact you by email or SMS with information about products and services we believe you may be interested in where you have provided your consent for us to do so.

5. DISCLOSURE OF YOUR PERSONAL INFORMATION

We share personal information with the following parties:

- **Sportscotland** (overall number/gender of all participants)
- **Scottish Cycling** (age, postcode, overall number and gender of all participants)
- **British Cycling** (through management of membership through Club Management system)

6. HOW LONG DO WE KEEP PERSONAL INFORMATION FOR?

We keep you/your child's (*delete as appropriate*) information for as long as you/they (*delete as appropriate*) attend our sessions. When it becomes apparent that you/they (*delete as appropriate*) are no longer attending sessions, your data will be removed.

It is important to ensure that the personal information we hold about you is accurate and up-to-date, and you should let us know if anything changes, for example if you change your phone number or email address.

You can update the personal information we hold about you through contacting us by using the details set out in the "**Contacting us**" section below.

7. YOUR RIGHTS IN RELATION TO PERSONAL INFORMATION

You have the following rights in relation to your personal information:

- the right to be informed about how your personal information is being used;
- the right to access the personal information we hold about you;
- the right to request the correction of inaccurate personal information we hold about you;
- the right to request the erasure of your personal information in certain limited circumstances;
- the right to restrict processing of your personal information where certain requirements are met;
- the right to object to the processing of your personal information;
- the right to request that we transfer elements of your data either to you or another service provider; and
- the right to object to certain automated decision-making processes using your personal information.

You should note that some of these rights, for example the right to require us to transfer your data to another service provider or the right to object to automated decision making, may not apply as they have specific requirements and exemptions which apply to them and they may not apply to personal information recorded and stored by us. For example, we do not use automated decision making in relation to your



personal data. However, some have no conditions attached, so your right to withdraw consent or object to processing for direct marketing are absolute rights.

Whilst this privacy notice sets out a general summary of your legal rights in respect of personal information, this is a very complex area of law. More information about your legal rights can be found on the Information Commissioner's website at <https://ico.org.uk/for-the-public/>

To exercise any of the above rights, or if you have any questions relating to your rights, please contact us by using the details set out in the "**Contacting us**" section below.

If you are unhappy with the way we are using your personal information you can also complain to the UK Information Commissioner's Office or your local data protection regulator. We are here to help and encourage you to contact us to resolve your complaint first.

8. CHANGES TO THIS NOTICE

We may update this privacy notice from time to time. When we change this notice in a material way, we will update the version date at the bottom of this page. For significant changes to this notice we will try to give you reasonable notice unless we are prevented from doing so. Where required by law we will seek your consent to changes in the way we use your personal information.

9. CONTACTING US

In the event of any query or complaint in connection with the information we hold about you, please email the Secretary, secretary_cairngormcc@outlook.com

Version dated 29 July 2021