

## Data Protection Privacy Notice: Strathclyde Sport all categories of member and non-members.

### Introduction

Strathclyde Sport is committed to transparency and to complying with its responsibilities under data protection legislation. This privacy notice sets out important information regarding how we will use your information and your rights under the legislation. This privacy notice relates to individuals in the categories of:

- members of Strathclyde Sport
- non-members of Strathclyde Sport

### The Legislation

The General Data Protection Regulation (GDPR) is a new piece of legislation in force from 25 May 2018 which regulates how organisations are allowed to use personal data. This notice is intended to meet the transparency requirements of GDPR and to ensure that all individuals in the categories above know how their data will be processed.

### Who will process my personal information?

Under data protection legislation the University is the 'data controller'. This means that the University is responsible for how it uses and processes your personal data and for complying with requests from you in relation to your personal data, where appropriate under the legislation.

### How we use your information

We have set out below how we will use your information for different categories of members and non-members. We have set out below the main purposes for which we will use your information and who it is shared with. For each type of processing we are required, under GDPR, to identify our 'lawful basis for processing'. This is set out in Appendix A.

### Is my data secure?

Your personal data will be managed securely. Access will be restricted to only those staff or authorised agents who require it and on a 'need to know' basis. The University will employ any technical and organisational measures necessary to protect your data. You can find more information about our [Information Security policies](#) on our website.

### Keeping information updated

Strathclyde Sport strives to ensure that your personal data is accurate and up-to-date. Members also have a responsibility to advise appropriate Strathclyde Sport staff of changes to their contact information and relevant interests. In addition, you should advise Strathclyde Sport of any inaccuracies in the personal data held about you.

### Retention of Personal Data

Strathclyde Sport will retain your personal data only for as long as is necessary for the purposes described. Please see Appendix 1.

### **Where do we obtain information from?**

We obtain personal data about you from a variety of sources including from your membership application (including any supporting information you have supplied). Information you supply to us as part of an enquiry, voucher, attendance at an event, seminar etc.

### **What information about you do we collect and use?**

When you contact us or become a member the personal data we hold will consist of the information provided in your application and any other additional information you have supplied. Personal information may be held in electronic or hard copy format on various University systems relating to:

- personal and contact information (including emergency contacts and date of birth);
- payment information (including bank details)
- information supplied from Human Resources (staff only)
- Information supplied from Student Business (students only)
- Evidence of attendance at another college or university (non-Strathclyde students)
- Information to support concessions (proof of benefits, age)
- Evidence of employment (corporate membership)

'Special category' personal data may also be processed, where it is necessary and lawful for us to do so. This data is subject to additional protections and refers to data revealing physical or mental health.

### **Why do we collect and use your personal data?**

Strathclyde Sport collects, holds and uses a wide range of information about you for various reasons including:

- responding to queries
- processing membership applications
- arranging access to facilities
- processing bookings for access to classes/facilities
- administrative and financial management (including the processing of payments)
- managing events
- general promotion of Strathclyde Sport
- health and safety
- the prevention and detection of crime
- recording attendance
- meeting our legal obligations

Detailed information regarding the purposes for which we process your personal data and our legal basis for processing can be found in **Appendix A**.

### **Who do we share your data with?**

In some situations Strathclyde Sport is required to share your personal data with external organisations. Often this is where we have a statutory or legal or contractual obligation to provide information e.g. for the administration of our leisure management system.

### **Who has access to data?**

Your information will be shared internally only with those individuals who require it in the course of their duties and only to the extent necessary. This will primarily include members of Strathclyde Sport and staff in the Information Services Directorate (for the purpose of establishing IT accounts)

In addition to those listed above we also may share your data when requested by the following:

- any other authorised third party to whom Strathclyde Sport has a legal/contractual obligation to share data with (Gladstone leisure management system provider)

### **How long do we retain your data?**

We will retain your personal data for up to 7 years after your membership has expired for administrative and financial purposes.

Your personal data will be retained for marketing purposes until you unsubscribe from the service.

### **Your Rights**

You have the right to:

- find out what personal data we process about you and obtain a copy of the data, free of charge within one month of your request. We may make a charge for additional copies of the same information;
- ask us to correct inaccurate or incomplete data.
- withdraw consent to process your personal data at any time, if you were asked for and provided consent.

If you think we are acting unfairly or unlawfully you can:

- object to the way we are using your data;
- complain to the [UK Information Commissioner's Office](#).

Under certain conditions you also have the right to ask us to:

- restrict the use of your data e.g. if you have raised issues about the accuracy or use of your personal data, until we have investigated and responded to your concerns;
- erase your information or tell us to stop using it to make decisions about you;
- comply with your wishes where you have previously agreed to us processing your data for a particular purpose and have withdrawn your consent to further processing;
- provide you with a portable electronic copy of data you've given us.

Please contact us if you wish to exercise/enquire about any of these rights.

### **Contact Details**

Data Protection Officer  
University of Strathclyde  
Information Governance Unit  
16 Richmond Street  
Glasgow, G1 1XQ  
Email: [dataprotection@strath.ac.uk](mailto:dataprotection@strath.ac.uk)  
Phone: 0141 248 3217

### **More information**

To find out more about data protection and your rights please see:

- The Information Commissioner's Office website: <http://www.ico.gov.uk>.
- The University's Data Protection webpages <http://www.strath.ac.uk/dataprotection/>

## Appendix A

Purpose	Lawful basis	Special category data
<b>Administration, management and legal purposes</b>		
Responding to enquiries	Consent	
Management and administration of members (including contact details, images, relevant interests, etc.)	Contract; legitimate interest	Consent or legal obligation
Accounting and financial processes: payment of fees	Contract	
Promotion of the Strathclyde Sport, e.g. press releases/images (moving and still)	Legitimate interests – promoting Strathclyde Sport Consent	
Marketing (non-members)	Consent	
<b>Safety, security and prevention and detection of crime</b>		
Operation of CCTV system	Legitimate interests	
Control of access to buildings/facilities	Public task; legitimate interests	
Disclosing information to emergency contacts and/or third parties in emergency situations	Vital interests of the data subject or another person	Vital interests of the data subject or another person
Where we must comply with a legal obligation	Legal obligation	Substantial public interest