



## Scottish Squash Privacy Notice – For Members

(Version 4 | 31 January 2024)

### About this privacy notice

Scottish Squash (“we”, “us”) is the national governing body of the sport of squash in Scotland. This privacy notice tells you what we do, as a data controller under the UK General Data Protection Regulation (“GDPR”), with your personal data that you provide to us in the membership form to join Scottish Squash, unless otherwise stated.

When you register as a member of Scottish Squash, 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, phone number, gender, and date of birth;
- Membership criteria/category.

### Purposes of processing - why we need your personal information

#### - Contractual purposes

We need to collect your personal information as a member so that we can manage your membership. We use our members’ personal information to:

- Provide members with core member services, including notices and voting rights of general meetings, insurance, PVG checks, coaching and refereeing development opportunities, competition entries and results, and player pathway and training opportunities;
- Set up online membership accounts on SportyHQ ([www.sportyhq.com/](http://www.sportyhq.com/));
- Send membership communications by email in relation to essential membership services, including but not limited to, membership renewals and information on membership benefits.

Where we process your personal data in order to fulfil the terms of your membership agreement, we rely on the legal condition in the UK GDPR for processing necessary for the performance of a contract with you. If you do not provide us with all of the personal information that we need to collect for these purposes, then this may affect our ability to offer the above membership services and benefits.

#### - Legitimate interests

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

- Promote and encourage participation in the sport of Squash 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, where appropriate, in images captured from our competitions and events, which we may use for promotional, education and development purposes.
- Provide competition in the sport of Squash 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 the sport of Squash 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 PVG/child protection requirements.
- Respond to and communicate with members regarding questions, comments, support needs or complaints, concerns or allegations in relation to the sport of Squash. If you make a complaint, we will use your personal information to investigate your complaint, to suspend membership and take disciplinary action where appropriate.

Before we process your personal data in pursuit of legitimate interests, we carefully assess the balance between our interests as a data controller and your interests as an individual (a legitimate interests assessment). If we do 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 [info@scottishsquash.org](mailto:info@scottishsquash.org). 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.

### **- 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;
- 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;
- 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.

Where we process your personal data in order to comply with a legal obligation, we do so only to the extent necessary to achieve compliance with that obligation.

### **- 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 without our sport.

### **Consent to processing**

If we consider that we need your consent to process your personal data, e.g. in relation to use of your image in certain circumstances, we will take steps to ensure that the consent, if given, meets the requirements of the GDPR, to be informed, signified, freely given and specific, and 'explicit' where the



personal data is special category data.

### **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 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 **sportscotland** and Team Scotland/Commonwealth Games Scotland 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.

Scottish Squash employs third party suppliers to provide services, including IT, payroll, coaching and tutoring, and communications. 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.

Scottish Squash employs SportyHQ to administer our membership database and process tournament entries, as part of which SportyHQ contracts third party payment providers to process your payments on our behalf. SportyHQ 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.

We will share personal information with SquashLevels, a data controller, who may process personal information shared with them by us, but subject to written contractual conditions to only process that personal information under our instructions and in full compliance with data protection law. This processing is covered by a Data Sharing Agreement.

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

Your personal information is stored on our electronic filing system and our servers based in the UK/EU, 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 five years.

We will keep certain personal information of members for longer in order to confirm your identity, when you were a member of Scottish Squash and for how long. We need to do this to comply with the Companies Act 2006, which required us to keep a register of members or in the event of a claim against Scottish Squash.



## Your rights

You can exercise any of the following rights by writing to us at [info@scottishsquash.org](mailto:info@scottishsquash.org).

Your rights are 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 Scottish Squash 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) or at:

Address: UK Information Commissioner  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF  
Helpline number: 0303 123 1113  
Website: <https://www.ico.org.uk>