



Privacy Policy

Edinburgh Giants WhRL has adapted the Scotland Rugby League privacy policy to be relevant to our club whilst following best practice to ensure that your data is managed in accordance with the relevant data protection rules and regulations.

Your personal information is important and you should treat it as you would any other valuable item.

Personal data is information that identifies you. It can be anything from your name, address or telephone number to where you went to school or the things you buy.

This Policy sets out our commitments to you, in compliance with and beyond the General Data Protection Regulation May 2018 (commonly known as the “GDPR”) and explains how we collect, store and use your personal information.

Although we are not required to appoint a Data Protection Officer, we have chosen for this to be managed via the Committee to ensure the highest level of commitment to your personal information. If you have any questions about this Policy or what we do with your personal information, the contact details are set out at the end of this policy statement.

Collecting specific, relevant personal information is a necessary part of us providing both you and the sport of Rugby League with an excellent service. When we hold or use your personal information, we will provide you with details covering what information we hold, how your personal information may be used, the basis for this use and details of your rights.

The General Data Protection Regulations act 2018 (GDPR) governs how we collect, store, process and share your data.

Any person or organisation that uses personal information is known as a data controller. Edinburgh Giants WhRL is the data controller in this instance. A data controller must comply with the eight principles of the data protection act. These ensure that personal information is:

- fairly and lawfully processed
- processed for limited purposes
- adequate, relevant and not excessive
- accurate and up to date
- not kept for longer than is necessary
- processed in line with your rights
- secure
- not transferred to other countries without adequate protection

This General Data Protection Regulations (GDPR) policy outlines the clubs commitment to the data protection principles and how we deal with personal information.

The data protection act also gives you the rights to a copy of the information held about you. This is known as a subject access request.

General Data Protection Regulations Policy

Edinburgh Giants WhRL data protection policy sets out our commitment to protecting personal data and how we implement that commitment with regards to the collection and use of personal data.

Edinburgh Giants WhRL is committed to:

- ensuring that we comply with the eight data protection principles, as listed below
- meeting our legal obligations as laid down by the GDPR data protection act 2018
- ensuring that data is collected and used fairly and lawfully
- processing personal data only in order to meet our operational needs or fulfill legal requirements
- taking steps to ensure that personal data is up to date and accurate
- establishing appropriate retention periods for personal data
- ensuring that data subjects' rights can be appropriately exercised
- providing adequate security measures to protect personal data
- ensuring that the Committee is responsible for data protection compliance and provides a point of contact for all data protection issues (The Data Controller)
- ensuring that all staff are made aware of good practice in data protection
- providing adequate training for all staff responsible for personal data
- ensuring that everyone handling personal data knows where to find further guidance
- ensuring that queries about data protection, internal and external to the organisation, is dealt with effectively and promptly
- regularly reviewing data protection procedures and guidelines within the organisation

General Data Protection Regulation Principles

- Personal data shall be processed fairly and lawfully;
- Personal data shall be obtained for one or more specified and lawful purposes and shall not be further processed in any manner incompatible with that purpose or those purposes;
- Personal data shall be adequate, relevant and not excessive in relation to the purposes for which they are processed;
- Personal data shall be accurate and, where necessary, kept up to date;
- Personal data processed for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes;
- Personal data shall be processed in accordance with the rights of data subjects under the General Data Protection Regulation Act (GDPR) 2018;

- Appropriate technical and organisational measures shall be taken against unauthorised and unlawful processing of personal data and against accidental loss or destruction of, or damage to, personal data;
- Personal data shall not be transferred to a country or territory outside the European Economic Area unless that country or territory ensures an adequate level of protection for the rights and freedoms of data subjects in relation to the processing of personal data.

What personal data does Edinburgh Giants WhRL hold for you and why?

GENERAL

Edinburgh Giants WhRL considers that it has a legitimate interest in ensuring that sufficient personal details are held to communicate directly with you, plus facilitate communications directly with other people involved in the club.

This data includes:

- personal contact details which allow us to contact you directly, such as name, title, email addresses and telephone numbers;
- date of birth;
- gender;
- membership details including start and end date;
- records of your interactions with us such as telephone conversations, emails and other correspondence and your instructions to us;
- any payment details you provide so that we can receive payments from you and details of the financial transactions with you;
- use of and movements through our online portal, passwords, personal identification numbers, IP addresses, usernames and other IT system identifying information;
- records of your participation and/or attendance at any events or competitions hosted by us;
- images in video and/or photographic form and voice recordings;

PLAYERS/PARTICIPANTS

If you are a player/participant who has registered his/her interest in participating in the sport competitively, you may also provide us with or we may obtain the following additional personal information from you:

- identification documents such as passport and identity cards;
- details of any club and/or league and/or other membership;
- details of next of kin, family members, coaches and emergency contacts;
- details of any medical conditions that our staff need to be made aware of
- records and assessment of any player rankings, gradings or ratings, competition

results, details regarding events/matches/games attended and performance (including that generated through player pathway programmes);

- any disciplinary and grievance information;
- any details required for the purposes of awarding scholarship funding or grants (including any means testing).

COACHES AND MATCH OFFICIALS

If you have registered with us to receive more information about our coaching and/or training and/or qualification programmes, you may also provide us with or we may obtain the following additional personal information from you:

- any coaching code or official number;
- your current member club or other organisation (if applicable);
- coaching/teaching qualification and/or officiating history and any player rating (if any);
- accreditation/qualification start and end date; and identification documents such as passport, utility bills, identity cards, etc.

SPECIAL CATEGORIES OF PERSONAL INFORMATION

We may also collect, store and use the following “special categories” of more sensitive personal information regarding you:

- information about your race or ethnicity, religious beliefs and sexual orientation;
- information about your health, including any medical condition, health and sickness records, medical records and health professional information.

It may be that we do not collect all of the above types of special category personal information about you. In relation to the special category personal data that we do process we do so on the basis that

- the processing is necessary for reasons of substantial public interest, on a lawful basis;
- it is necessary for the establishment, exercise or defence of legal claims;
- it is necessary for the purposes of carrying out the obligations and exercising our or your rights in the field of employment and social security and social protection law; or based on your explicit consent.

We may also collect criminal records information from you. For criminal records history, we process it on the basis of legal obligations or based on your explicit consent.

Additional information may be held in specific circumstances. For example, any applications made under Child Protection Disclosure (PVG) are held for legal reasons, or in the unfortunate event of an injury or accident, medical information may be requested.

For all Under 18's, we will hold personal data for parents/ guardians as above to allow us to contact them directly.

WHERE WE COLLECT YOUR INFORMATION

We typically collect personal information when you sign up to become an Edinburgh Giants WhRL club member, sign up to receive services or products provided through our website or other methods, apply to become a member of the Rugby Football League, apply to complete a coaching/match official course or qualification, purchase any services or products we offer, make a query and/or complaint or when you correspond with us by phone, e-mail or in some other way.

If you are a player/participant of Rugby League we also may collect personal information about you from any club, school, college, university or other organisation you are affiliated with or from other referrals such as from coaches or talent scouts.

If you are providing us with details of referees, next of kin, beneficiaries, family members and emergency contacts they have a right to know and to be aware of what personal information we hold about them, how we collect it and how we use and may share that information. Please share this Privacy Policy with those of them whom you feel are sufficiently mature to understand it. They also have the same rights as set out below.

HOW WE USE THE INFORMATION

The table below describes the main purposes for which we and, where appropriate, other Rugby Football League bodies process your personal information, the categories of your information involved and the lawful basis for being able to do this.

ALL INDIVIDUALS

Purpose	Personal Information used	Lawful Basis
To administer any membership account(s) you have, manage the relationship with you and 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 your membership contract with us. Where appropriate, you have given us your explicit consent to do so.

<p>To arrange and manage any contracts for the provision of any merchandise, products and/or services.</p>	<p>All contact and membership details. Transaction and payment information.</p>	<p>This is necessary to enable us to properly administer and perform any contract for the provision of merchandise/products/services</p>
<p>To send you information which is included within a membership benefits package, including details about advanced ticket information, competitions and events, partner offers and discounts and any updates on Rugby League.</p>	<p>All contact and membership details.</p>	<p>This is necessary to enable us to properly manage and administer your membership contract with us. Where appropriate, you have given us your explicit consent to do so.</p>
<p>To send you other marketing information you might find useful or which you have requested, including newsletters, information about Membership, events, participation products and information about commercial partners.</p>	<p>All contact and membership 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 in some cases, we may have legal or regulatory obligations</p>

		to retain records. We process special category personal data on the basis of the “special category reasons for processing of your personal data” referred to in section 4 above. For criminal records history we process on the basis of legal obligations or based on your explicit consent. We have specific retention policies in relation to compliance and safeguarding matters and have a legitimate interest in retaining such records for varying lengths of time. Where we process medical information we retain it for 10 years (or 10 years from the age of 18 where appropriate) unless this data is anonymised.
The security of IT systems.	Your usage of our IT systems and online portals.	We have a legitimate interest to ensure that our IT systems are secure.
To conduct data analytics studies to better understand event attendance and trends within the sport.	Records of your participation and/or attendance at any events or competitions.	We have a legitimate interest in doing so to ensure that our membership is targeted and relevant.
For the purposes of promoting the sport, our events and membership packages.	Images in video and/or photographic form.	Where you have given us your explicit consent to do so except where such is not possible (i.e crowd photos from events, where you will be notified of such as part of your ticket purchase).

To comply with health and safety requirements	Records of attendance	We have a legal obligation and a legitimate interest to provide you and other members of our organisation with a safe environment in which to participate in sport.
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PLAYERS & PARTICIPANTS

Purpose	Personal Information used	Lawful Basis
To conduct performance reviews, manage performance and determine performance requirements and administer your development and training requirements on any player pathway programme Personal information used.	All performance and attendance data and information about your health and medical condition. Details of any member club and/or other membership.	This is necessary to enable us to properly manage and administer your development through the performance programme. We process special category personal data on the basis of the “special category reasons for processing of your personal data” referred to in section 4 above.
To make decisions about your progression and development through any player pathway programme and to assist with the delivery of rankings and ratings.	All performance and attendance data and information about your health. Details of any member club and/or other membership.	This is necessary to enable us to properly manage and administer your development through the performance programme. We process special category personal data on the basis of the “special category reasons for processing of your personal data” referred to in section 4 above.
To administer and monitor your participation and/or attendance at events and competitions.	All non-medical performance and attendance data. Details of any member club and/or other membership.	This is necessary to enable us to register you on to and properly manage and administer your development through the performance programme.

<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 the event. We process special category personal data on the basis of the “special category reasons for processing of your personal data” referred to in section 4 above.</p>
<p>To administer any drug and alcohol testing.</p>	<p>Health and medical information.</p>	<p>We process special category personal data on the basis of the “special category reasons for processing of your personal data” referred to in section 4 above.</p>
<p>To use information about your physical or mental health (including any injuries) or disability status, to ensure your health and safety and to assess your fitness to participate, to provide appropriate adjustments to sports facilities and to monitor and manage sickness absence.</p>	<p>Health and medical information.</p>	<p>We process special category personal data on the basis of the “special category reasons for processing of your personal data” referred to in section 4 above.</p>
<p>To gather evidence for possible grievance or disciplinary hearings.</p>	<p>All the personal information we collect including any disciplinary and grievance information.</p>	<p>We have a legitimate interest in doing so to provide a safe and fair environment for all members and to ensure the effective management of any disciplinary hearings, appeals and adjudications. We process special category personal data on the basis of the “special category reasons for processing of your</p>

		personal data” referred to in section 4 above. For criminal records history we process it on the basis of legal obligations or based on your explicit consent.
To gather evidence for potential and actual compliance cases.	All the personal information we collect.	We have a legitimate interest in doing so to provide a safe and fair environment for all members and to ensure the effective management of any compliance cases. We process special category personal data on the basis of the “special category reasons for processing of your personal data” referred to in section 4 above. For criminal records history we process it on the basis of legal obligations or based on your explicit consent.
To assess your eligibility for and to provide any scholarship funding and/or grants.	All details required for the purposes of awarding scholarship funding or grants (including any means testing).	This is necessary to enable us to properly administer and perform any contract for the provision of funding.
For the purposes of equal opportunities monitoring.	Name, title, date of birth, gender, information about your race or ethnicity, health and medical information and performance data.	We have a legitimate interest to promote a sports environment that is inclusive, fair and accessible. We process special category personal data on the basis of the “special category reasons for processing of your personal data” referred to in section 4 above.
To register you on our player registration system, the	All the personal information we collect.	This is necessary to enable us to properly manage and

<p>regulation and administration of rugby league competitions and fixtures and for the purpose of your involvement in rugby league, contacting you via by electronic mail (including email and SMS) to tell you about rugby league competitions, fixtures and services, the publishing of match, fixture and/or competition information (for example, try scorers) on our website; and internal reporting purposes by our data analytics team.</p>		<p>administer your membership with us.</p>
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COACHES & MATCH OFFICIALS

Purpose	Personal Information used	Lawful Basis
<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 your current member club or other, coaching/teaching qualifications and/or officiating history.</p>	<p>This is necessary to enable us to register you on to and properly manage and administer your development through the course and/or programme.</p>
<p>To conduct performance reviews, managing performance and determining performance requirements.</p>	<p>All performance and attendance data and information about your health. Details of your current member club or other, coaching/teaching qualifications and/or officiating</p>	<p>This is necessary to enable us to properly manage and administer your development through the course and/or programme. We process special category personal data on the basis of the “special category reasons for</p>

	history. Qualification start and end dates.	processing of your personal data” referred to above.
To make decisions about your progression and accreditation status.	All performance and attendance data and information about your health. Details of your current member club or other, coaching/teaching qualifications and/or officiating history. Qualification start and end dates.	This is necessary to enable us to properly manage and administer your development through the course and/or programme. We process special category personal data on the basis of the “special category reasons for processing of your personal data” referred to above.
To comply with legal obligations, for example, regarding people working with children or vulnerable adults to comply with our safeguarding requirements.	Information about your criminal convictions and offences.	For criminal records history we process it on the basis of legal obligations or based on your explicit consent.
To gather evidence for potential and actual compliance cases.	All the personal information we collect.	We have a legitimate interest in doing so to provide a safe and fair environment for all members and to ensure the effective management of any compliance cases. We process special category personal data on the basis of the “special category reasons for processing of your personal data” referred to above. For criminal records history we process it on the basis of legal obligations or based on your explicit consent.

To administer any drug and alcohol testing.	Health Information.	We have a legal obligation and a legitimate interest to provide you & other members of our organisation with a safe environment in which to participate in sport. We process special category personal data on the basis of the "special category reasons for processing of your personal data" referred to above.
To arrange for any trip or transportation to and from an event.	Identification documents, details of next of kin, family members and emergency contacts, transaction and payment information, health and medical information.	This is necessary to enable us to make the necessary arrangements for the trip and/or transportation to the event. We process special category personal data on the basis of the "special category reasons for processing of your personal data" referred to in section 4 above.

For some of your personal information you will have a legal, contractual or other requirement or obligation for you 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 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 position as a member.

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 section below.

Please note however that the withdrawal of your consent will not affect any use of the data made before you withdraw 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.

DIRECT MARKETING

From time to time, we may contact you by email, post, phone or SMS with information about products and services we believe you may be interested in.

You can also unsubscribe from our marketing by clicking on the unsubscribe link in the marketing messages we send to you.

WHO HAS ACCESS TO YOUR PERSONAL INFORMATION

Your personal data records are held and maintained by the Edinburgh Giants WhRL Committee. Only authorised club personnel have access to this information.

During the planning and preparation stages for all training sessions, development days, tournaments and international games the relevant staff will have access to contact data – email address and mobile phone number – this allows them to communicate appropriately to all parties involved in this activity. Team Managers will hold additional data as required such as emergency contact details, next of kin, medical conditions.

DISCLOSURE OF YOUR PERSONAL INFORMATION

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 and 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 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.

Generally we share information where we need to do so in order to run our organisation (e.g. where other people process information for us or are required to process information for the benefit of Rugby League). In such circumstances, we will put in place arrangements to protect your personal information. Outside of that we do not disclose your personal information unless we are required to do so by law.

We share personal information with the following parties:

- Any party approved by you or notified to you at the point of data collection;
- To any governing bodies, leagues or clubs to allow them to properly administer Rugby League on a local, regional and national level;
- Other service providers: for example, email marketing specialists, payment processors, data analysis, promotional advisors, contractors or suppliers and IT services (including CRM, website, video and teleconference services);
- Our supply chain partners and subcontractors, such as couriers, import/export agents and shippers;
- Our commercial partners: for the purposes of providing you with information on any tickets, special offers, opportunities, products and services and other commercial benefits provided by our commercial partners either as part of your membership package or where you have given your express for us to do so;
- The Government or our regulators: where we are required to do so by law or to assist with their investigations or initiatives;
- Police, law enforcement and security services: to assist with the investigation and prevention of crime and the protection of national security;
- Certain parties who act as joint Data Controllers or Data Processes in relation to services that we provide. You will be notified where this is the case;
- The Rugby League League
- Those who we are required to share your personal information with for the purpose of monitoring betting and/or anti-doping for the purposes of compliance cases.

We do not disclose personal information to anyone else except as set out above.

HOW LONG DO WE KEEP PERSONAL INFORMATION FOR?

We will only hold your information for as long as necessary. When you ask us to delete records, we may delete it earlier, subject to any retention requirements.

The duration for which we retain your personal information will differ depending on the type of information and the reason why we collected it from you. However, in some cases personal information may be retained on a long-term basis: for example, personal information that we need to retain for legal purposes will normally be retained in accordance with usual commercial practice and regulatory requirements. Generally, where there is no legal requirement we retain all physical and electronic records for a period of 6 years after your last contact with us.

Exceptions to this rule are:

- Information that may be relevant to personal injury claims, or discrimination claims may be retained until the limitation period for those types of claims has expired. For personal injury or discrimination claims this can be an extended period as the limitation period might not start to run until a long time after you have worked with us;

- Where we have specific internal policies relating to the retention of data for compliance matters;
- Where we have specific internal policies relating to the retention of medical data.

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.

YOUR RIGHTS IN RELATION TO PERSONAL INFORMATION

You are entitled by law to ask for a copy of your personal information at any time. You are also entitled to ask us to correct, delete or update your personal information, to send your personal information to you or another organisation and to object to automated decision making. Where you have given us your consent to use your personal information in a particular manner, you also have the right to withdraw this consent at any time.

To exercise any of your rights, or if you have any questions relating to your rights, please contact us by using the details set out below. You can also unsubscribe from any direct marketing by clicking on the unsubscribe link in the marketing messages we send to you.

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 Policy 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/>.

If you are unhappy with the way we are using your personal information, we are here to help and would encourage you to contact us to resolve your complaint by using the contact details set out below.

LINKING WITH THIRD PARTY SITES

Our Site may, from time to time, contain links to and from the websites of our commercial partners, Rugby League Bodies, advertisers and clubs. If you follow a link to any of these websites, please note that these websites have their own privacy policies and they will be a data controller of your personal information. We do not accept any responsibility or liability for these policies and you should check these policies before you submit any personal information to these websites.

In addition, if you linked to this Site from a third-party site, we cannot be responsible for the privacy policies and practices of the owners or operators of that third-party site and recommend that you check the policy of that third party site and contact its owner or operator if you have any concerns or questions.

SECURITY

We employ a variety of technical and organisational measures to keep your personal information safe and to prevent unauthorised access to, or use, or disclosure of it. Unfortunately, no information transmission over the Internet is guaranteed 100% secure nor is any storage of information always 100% secure, but we do take all appropriate steps to protect the security of your personal information.

COOKIES

Certain parts of our Site use "cookies" to keep track of your visit and to help you navigate between sections.

LOG FILES

In common with most websites, our Site logs various information about visitors, including internet protocol (IP) addresses, browser type, internet service provider (ISP) information, referring / exit pages and date / time stamp.

We may use this information to analyse trends, administer the Site, track your movement around the Site and gather broad demographic information.

CHANGES TO THIS POLICY

You are encouraged to check back regularly for updates to our Privacy Policy, as we may make changes at any time. When we change this Policy in a material way, we will update the version date at the bottom of this page. Please check back frequently to see any updates or changes to this Policy and should you object to any alteration, please contact us as set out in the section below.

CONTACT

In the event of any query or complaint in connection with the information we hold about you, our Committee who act as the Data Controller can be contacted by email on club@scotlandrl.com.