



University of
St Andrews

University privacy notice: University Athletic Union – affiliated sports club memberships

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| Document Type | Privacy notice |
| Scope (applies to) | Public |
| Applicability date | 22/04/2020 |
| Review/expiry date | 01/03/2023 |
| Approved date | 22/04/2020 |
| Approver | Deputy Director of Sport |
| Document Owner | Head of Information Assurance and Governance |
| School / unit | Saints Sport |
| Document status | Approved |
| Information classification | Public |
| Equality impact assessment | None |
| Key terms | GDPR, DPA 2018 |
| Purpose | This document outlines how the personal data of Athletic Union Club members is collected and used and shared. |

| Version number | Purpose / changes | Document status | Author of changes, role and school / unit | Date |
|-----------------------|---------------------------------------|------------------------|--|-------------|
| 1.0 | First version | Approved | Chris Milne, Head of Information Assurance and Governance, Office of the Principal | 04/09/2018 |
| 2.0 | Second issue, following annual review | Approved | Chris Milne, Head of Information Assurance and Governance, Office of the Principal | 22/04/2020 |

1. How the University will make use of your personal data

The University is required to inform you how personal data collected by you will be used and to provide other information, including details of with whom personal data may be shared and your rights.

2. The identity and the contact details of the controller

University of St Andrews, College Gate, North Street, St Andrews, KY16 9AJ, Fife, Scotland, UK. The University is a charity registered in Scotland, No SC013532.

3. The contact details of the University Data Protection Officer

Mr Christopher Milne, Head of Information Assurance and Governance, University of St Andrews, email dataprot@st-andrews.ac.uk

4. The purposes for which the University will make use of personal data

4.1. Administering your membership of sports clubs affiliated with the University of St Andrews Athletics Union ("AU")

This will include:

- Managing your membership of a club(s);
- Registering you with any relevant sporting associations or bodies; and
- Managing any disciplinary processes/investigations instigated by a club, sporting association/body or the AU.

The personal data which will be collected from you will include: your name; (contact) email address; confirmation that you are/are not under 18 years of age when joining; confirmation if you do/do not hold a Fitness + or Club Access membership and year of study.

Your personal data is used by a sports club(s) committee, including office bearers, who are elected/appointed from the student membership you have.

4.2. Providing you with services

This will include:

- Preparing for and to provide you with services/events that a club may offer, either on its own or through the University Sports Centre and/or any other third parties engaged by the club/committee to provide those services.

4.3. Advising you of services

Club committees may contact you to advise you of events/services that you may be interested in that are offered by a club of which you are a member. The University Development Office may reach out to alumni who were sports club members to advise of events that be of interest, including club reunions, dinners and other events that are run from time to time, where that is in your and the University’s legitimate interests.

If you do not wish to be advised of events/services, please advise the relevant club committee member and arrangements will be made so that no similar communication with you will take place, until such times as you choose otherwise. Similarly, if you have no interests when as an alumni in being contacted about club events, please advise the University Development Office.

5. The legal bases for processing personal data

5.1. Contract

- When using your personal data to create and administer your membership, to provide you with club services and to alert you to events/services being offered by a club.

5.2. Legitimate interests

- When using your personal details to advise you of alumni related sports club events. Again, if you do not wish to receive details of those, please contact the Development Office, at any time; and
- Where personal details are exchanged with third party sporting bodies/associations for purposes of managing membership with those bodies, which may include supporting investigations as to whether policy/regulation/articles of association of such a body have been upheld or otherwise.

6. Who personal data may be shared with

| Disclosure to for the purposes of | Details |
|---|--|
| University staff and or agents/suppliers of the University; to provide you with services and facilities through Saints Sport. | Membership, booking and contact details |
| The AU; to support any investigation and/or disciplinary process | Membership and contact details, and any details as necessary to support an investigation and/or disciplinary process |

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| Sports associations/bodies; to register you with an external body where that is a requirement of club membership and to support any investigation and/or disciplinary process instigated by such an external body. | Membership and contact details, details of sporting achievements, and any details as necessary to support an investigation and/or disciplinary process |
| The University Development Office; to provide alumni with details of club events/activities for former students. | Membership and contact details, and details of sporting achievements |

7. The period for which personal data will be stored, or if that is not possible, the criteria used to determine that period

Information about your sports club membership(s) will be destroyed 6 years after any subscriptions have ended. Clubs may keep information about sporting honours and achievements in perpetuity, to support, celebrate and promote the history and sporting achievements. The University Development Office may retain details of your membership of a club/(s) for longer, to provide alumni with details of news and events, as described.

8. Rights available to individuals

European and UK data protection legislation provides individuals with a number of rights regarding the management of their personal data, in relation to guests making use of University accommodation your rights are:

- The right of access to your personal data, commonly referred to as a subject access request, which involves the following being carried out within a calendar month:
 - Confirmation that personal data is being processed.
 - Access being given to your personal data (provision of a copy), unless an exemption(s) applies; and
 - The provision of supplementary information e.g. an explanation of how your personal data is processed and who this is shared with.
- The right to rectification, which may involve:
 - The University working to correct any inaccuracies in personal data or to address any omissions, which may require personal data to be annotated to acknowledge that this is incomplete.
- The right to erasure (the deletion of personal data, in specific circumstances), which is commonly referred to as the right to be forgotten, which may involve:

- The University destroying specific personal data. However, that right does not extend to guest registration records, as the University is required by law to collect and retain those details.
- The right to restrict processing, which may involve:
 - The University agreeing to stop making use of your personal data where those data are contested, in terms of accuracy.
- The right to data portability, which may involve:
 - The University providing you with a copy of elements of your personal data that exist in machine readable form that you have given to the University.
- The right to object. Individuals have the right to object to the University making use of contact details for direct marketing – in such circumstances the use of personal data must stop when an objection is received.

These rights have to be met by the University and any other organisation that takes decisions about how or why your personal data is used. Details on how to access those rights are available from the University website, or you can contact dataprot@st-andrews.ac.uk.

9. Where the University asks for your consent to make use of personal data

Saints Sport may ask you for your permission to be contacted in the future, via any contact details you have provided to:

- Provide you with details of services and offers that fall outwith those you are entitled to receive as part of your membership; and

Consent is optional. Individuals are under no compulsion to provide their consent, and where consent is provided, you will have the right to withdraw consent at any time, from which point the University's use of your personal data will stop.

From time to time, the University may ask you about your experiences as a member of Saints Sport, a user of the facilities provided by or through the University Sports Centre to help us improve the quality of our services and the experience of all Saints Sports Members. Responding is voluntary and analysis of any survey returns is done at an aggregate level.

10. The right to lodge a complaint with a supervisory authority

If you believe that the University has not made use of your personal data, in line with the requirements of the law, you have the right to raise this with the regulator i.e. the UK Information Commissioner Office's ("the ICO"), however, you should first raise any concerns with the University Data Protection Officer.

Details on how to contact the ICO are available online, at:

- <https://ico.org.uk/global/contact-us/>

11. Contractual requirement to provide personal data and the consequence where no personal data are provided

In order to secure club membership and access to the associated services/events, you must provide details about you and your preferred contact details in order to become a registered member.

12. Revision of the Privacy Notice

This Privacy Notice will be reviewed at regular intervals. The review period will be approved by the University and recorded on the accompanying coversheet. Any significant change to relevant legislation, University policy or procedures primarily concerned with the protection of personal data may trigger an earlier review.

13. Availability

This Privacy Notice will be published on the University website.

Should a copy of this Privacy Notice be required in another form, including orally i.e. an audio recording, please contact dataprot@st-andrews.ac.uk.

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