



University of  
St Andrews

## University privacy notice: University Sports Centre – Saints Sport membership

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| <b>Document Type</b>              | Privacy notice   |
| <b>Scope (applies to)</b>         | Public   |
| <b>Applicability date</b>         | 17/04/2020   |
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| <b>Approved date</b>              | 17/04/2020   |
| <b>Approver</b>                   | Deputy Director of Sport   |
| <b>Document Owner</b>             | Head of Information Assurance and Governance   |
| <b>School / unit</b>              | Saints Sport   |
| <b>Document status</b>            | Active   |
| <b>Information classification</b> | Public   |
| <b>Equality impact assessment</b> | None   |
| <b>Key terms</b>                  | GDPR, DPA 2018   |
| <b>Purpose</b>                    | This document outlines how the personal data of University Sports Centre members is collected and used and shared. |

| <b>Version number</b> | <b>Purpose / changes</b>   | <b>Document status</b> | <b>Author of changes, role and school / unit</b>                               | <b>Date</b> |
|-----------------------|--|------------------------|--|-------------|
| 1.1                   | First version  | Approved               | Chris Milne, Head of Information Assurance and Governance, Principal's Officer | 10/05/2018  |
| 2.0                   | Second version – minor updates (video imagery for coaching etc.) | Approved               | Chris Milne, Head of Information Assurance and Governance, Principal's Officer | 17/04/2020  |

## 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, Email [dataprot@st-andrews.ac.uk](mailto:dataprot@st-andrews.ac.uk)

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

### 4.1. Administering your Saints Sport Membership

Your personal data is used by the Saints Sport to set-up and administer your Saints Sport membership; which will involve creating a member record. The personal data, which will be collected from you will include: your name; date of birth and preferred contact details and photograph.

### 4.2. Providing you with services

Your details will be used to prepare for and to provide you with services from the University Sports Centre i.e. to take and manage bookings. Staff from Saints Sport may use your contact details to advise if changes to any prior booking arrangements are required.

### 4.3. Advising you of services

Saints Sport may contact you to advise you of services and facilities that you may be interested in. If you do not wish to be advised of services or facilities, please advise staff at the Sports Centre and arrangements will be made so that no similar communication with you will take place, until such times as you choose otherwise.

## CCTV

The University Sports Centre uses CCTV cameras, for the protection of University property and resources, to provide a safe environment and for the purposes of crime prevention and detection. Saints Sport may review CCTV footage to understand whether individuals have upheld conditions of membership and other rules/regulations that may apply to them, when using the facilities.

Additionally, recording facilities may be used by Saints Sport, where a Team or individual member has requested audio recordings to be taken for coaching and/or sports analysis and developmental purposes.

**4.4 Improving our services**

If you provide the University with feedback about your experiences of the Sports Centre, we will use that information to improve our services.

**5. The legal bases for processing personal data**

Your personal data will be used to service the contract between members of the Saints Sport or for preparation for entry into a contract. The University makes use of CCTV footage for protecting resources and safety purposes under its public task. Contract is the lawful basis used where use of CCTV footage is made to understand whether conditions of membership have/have not been breached; and to provide video imagery where members/teams have request such for coaching/sports development purposes.

**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. | Booking details.   |
| Sports Clubs affiliated to the University Athletics Union.  | Membership and contact details, to support club memberships.<br>Video recordings/imagery under prior arrangement for coaching/sports analysis. |

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

The University will retain customer/booking data for a period of 6 years, after which time records will be destroyed. CCTV footage will be destroyed (overwritten) after 30 days.

**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](mailto: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 – where you receive communications about such you can opt to stop receiving those at any time, please contact Saints Sport; and

- 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.

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.

### **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 first with the University (please contact the University DPO at [dataprot@st-andrews.ac.uk](mailto:dataprot@st-andrews.ac.uk)) and then with the regulator i.e. the UK Information Commissioner Office's ("the ICO").

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 services from the University Sports Centre, as a member of Saints Sport, 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](mailto:dataprot@st-andrews.ac.uk).

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