

Performance Programme Privacy Statement June 2019

1 Privacy Statement - Your Personal Information

- 1.1 Amongst other legislation we are governed by the new General Data Protection Regulation (GDPR) which requires us to be very clear about why we need your personal information, what we will do with that information and importantly your rights to object to us processing your information and to be removed from our records.
- 1.2 The RYA and RYA Scotland work closely on the provision of performance pathway activities and are “joint controllers” of the personal information that you provide to us.
- 1.3 By signing the consent section on the forms attached to this statement you are agreeing to us processing parts of your personal information which are considered “special category” for the purposes detailed below.
- 1.4 If you are under the age of 16 you must have a parent or guardian sign this form.
- 1.5 **What we need**
- 1.6 As a participant in our performance pathway activity (which includes, Class Academy, Development Team, Transition, Talent ID and Elite activity) we will ask you for the following personal information:
 - Your contact details – name, address, email address, date of birth, gender, home and mobile telephone numbers;
 - Some participation details – for example your club, your class and sail number
 - Details of your bank account into which we will pay expenses or refunds
- 1.7 We may also collect certain information which may include medical conditions, body measurements, fitness measures or other specific requirements that are important to monitoring your athletic performance and proving for your safety during performance pathway activity. This information relates to health and as such would be considered to be a ‘special category’.
- 1.8 We are required to seek your specific permission to process personal information considered to be a ‘special category’.
- 1.9 **Why we need your personal information – contractual**
- 1.10 For those who enter our Development Team, train alongside or are Elite Athletes, we need to process your personal information to be able to contact you in relation to our agreement with you to be on our performance pathway programme and to be able to honour our commitments within this agreement.

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1.11 Why we need your personal information – legitimate interests

- 1.12 For all participants in performance pathway activity, we need your personal information to be able to contact you on RYA Scotland business in relation to your participation in performance pathway activity. This will include booking places on weekends, engaging with coaches, contacting you if there are changes to activity provision and to inform you of further opportunities in performance pathway activity.
- 1.13 If you do not provide us with all of the personal information that we need to collect then this may affect our ability to fulfil our commitment to you.
- 1.14 We need information on things like your age, gender, club, class and sail number to be able to monitor your results.
- 1.15 We need certain sensitive or medical information to be able to monitor changes in your athletic performance and provide you with appropriate training, guidance and support and ensure our safety provision is suitable for your needs. This is considered special category information and we need your specific consent to process this information.
- 1.16 Where we 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 Admin@RYAScotland.org.uk. If we comply with your objection, this may affect our ability to undertake the tasks above for the benefit of you as a participant.

1.17 Why we need your personal information – equality monitoring requirements

- 1.18 We are required to process certain personal information relating to age, sex, racial or ethnic origin and sexual orientation for equality monitoring purposes as required by sportscotland.
- 1.19 We capture and process this information anonymously through aggregated data 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 within our sport.

1.20 Who we share your personal information with

- 1.21 As a participant in our performance pathway activity, your progress, performance and safety are of interest to a number of partners with whom we may share your personal information for the purposes above. They are:
- The sportscotland Performance Manager – for the purposes of demonstrating effective progression towards individual and organisational targets;

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- Our contracted Coaches – for the purposes of contacting and tailoring your training and development to your needs;
 - In some cases The Scottish Institute of Sport – for the purposes of contacting you, monitoring your athletic performance and providing tailored support and guidance and the safety officer for the activity you are engaged in.
- 1.22 These partners 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.
- 1.23 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.
- 1.24 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 RYA (UK) for promotional and/or journalistic purposes.
- 1.25 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, Marine Accident Investigation Branch and Police Scotland for the purposes of safeguarding children and informing relevant investigations.
- 1.26 We may also be required to share personal information relating to athletes’ health in order to undertake activities to eliminate doping, at a sporting event, within our sport generally, or to provide information about doping, or suspected doping, to UK Anti-Doping or another body with responsibility for eliminating doping in our sport.
- 1.27 How we protect your personal information**
- 1.28 RYA Scotland will take all steps reasonably necessary including policies, procedures and security features to ensure that your data is treated securely and protected from unauthorised and unlawful access and/or use, and in accordance with this notice.
- 1.29 Your personal information is stored on our electronic filing system on our servers based in the UK and is accessed by our staff for the purposes set out above. These servers are only accessible to RYA employees and the IT administrator of the RYA.

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1.30 International transfer of personal data

1.31 RYA Scotland does not envisage transferring any information about or relating to individuals to anyone who is located outside of the European Economic Area. However you should be aware that RYA policy may result in the data that we share with them or that they collect from you, being transferred to, and stored at, a destination outside the EEA. The RYA policy is available on RYA website www.rya.org.uk/legal-info

1.32 How long we keep your personal information

1.33 RYA Scotland abides by the Privacy and Data Protection policy set by the RYA the detail of which is available on the RYA website www.rya.org.uk/legal-info

1.34 We will only keep your personal information for as long as necessary to enable us to fulfil our commitments to you. For participants in our performance pathway activity we will keep your personal information for one year after our engagement or support for you in this capacity ceases after which it will be deleted. This will not affect personal information retained by the RYA.

1.35 Any data relating to the obligations of RYA Scotland to maintain a comprehensive, index of performance results as a Scottish Governing Body for sport will be retained. This would not include more than name, age category and gender alongside details of the results for an individual participant in our performance pathway activity.

1.36 Personal data linked to the processing of insurance claims, subject access requests, disputes, safeguarding investigations, disciplinary or police matters will only be kept for as long as it necessary for those purposes, as each is applicable.

1.37 Your rights

1.38 You can exercise any of the following rights by writing to us at RYA Scotland, Caledonia House, Redheughs Rigg, South Gyle, Edinburgh EH129DQ or by emailing us at Admin@RYAScotland.org.uk

- Your rights 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; and
- If you wish us to delete your personal information, you may request that we do so.



Royal Yachting Association Scotland

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- 1.39 Any requests received by RYA Scotland will be considered under applicable data protection legislation. In certain circumstances the legal obligations to retain personal information will outweigh your right to have your personal information deleted. If you remain dissatisfied, you have a right to raise a complaint with the Information Commissioner's Office at www.ico.org.uk