

Glasgow Frontrunners Privacy and Data Protection Policy



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| Last Reviewed and Adopted | Reviewed by: |
| July 2023 | Drew Gibson (Sec), Johnpaul McCabe (WIO) |
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Privacy Policy

This is the Glasgow Frontrunners privacy policy. In this privacy notice 'us', 'we', 'our' or 'the club' refers to Glasgow Frontrunners. It should be read in conjunction with our procedures section below, which outlines how data flows through our club. This notice applies to all data subjects whose personal data is collected by us regardless of the method by which the data is collected (such as online or via a membership application form), in line with the requirements of the General Data Protection Regulation (GDPR).

What we need from members and participants

Glasgow Frontrunners will process personal data that you provide to us in the membership form. Please see our procedure document for the up-to-date link to this form.

When you run with us for the first time, we will ask for the following information by way of completing a new runner form.

- Contact details – name, phone number, email address
- Emergency contact – name, phone number, their relationship to you We ask runners to disclose disability information as required to their jog leaders. We will ask you for permission to use your email address to contact you for the purpose of checking how your run was, and to give you a link to our online runner form so we can keep an electronic record of our members.
- When you register with us or renew your membership, we will ask you for additional special category personal data alongside that already gathered above:
- gender identity, sexual orientation, address, date of birth, disability information, ethnic group, religion.

In order for us to process both personal data and special category data, we will require to obtain your explicit consent. In completing your application for membership, you are deemed to have provided consent for such purposes.

What we need from volunteers

Volunteers that are not members of the club will also be asked to provide the following personal information in relation to any volunteering role.

We will ask volunteers to provide :

- Your contact details – name, phone number, email address
- Emergency contact – name, phone number, their relationship to you
- Any additional relevant qualifications that the volunteer may hold, such as first aid training

Our Jog Leaders will be asked to regularly complete a form asking for their availability, as per our procedure document.

Why we need your personal information

We need to collect your personal information so that we can manage your membership, ensure the safety of all runners and the overall effective governance of the club. We will only use this personal information to:

- send members communications by email
- send members communications by text / telephone
- ensure the club can honour its duty of care to its members, volunteers and participants (i.e. keeping a record of emergency contacts and disability information).

If a runner does not provide us with the personal information that we need to collect then this may affect our ability to offer our membership services, benefits and appropriate care.

The online form is designed to ensure the appropriate information is captured, with compulsory fields. We need information about an emergency contact in case you have an accident, become unwell, or otherwise need medical assistance during a club run, training session or event. These details will only be used in the event of an emergency where the immediate health and/or safety of a member, volunteer or participant are compromised.

It is the responsibility of the member to ensure that these details are kept up to date and that they have told the individual or individuals to be contacted of the disclosure to Glasgow Frontrunners of their details. If there are any changes to your personal information (e.g. change of address) or your emergency contacts, notice of any changes should be provided to the Secretary (secretary@glasgowfrontrunners.org) by email.

Why we need your personal information – legitimate purposes

We also process our members' and volunteers' personal data in pursuit of our legitimate interests to:

- Promote and encourage participation in running by sending members communications and booking information for upcoming competitions and events. Members can unsubscribe from communications at any time by clicking the 'Unsubscribe' link on the mailout, or emailing comms@glasgowfrontrunners.org.
- Our competitions and events may be filmed or photographed and these photographs may also be used in images captured from our competitions and events, which we use for pro- motional, education and development purposes.
- Provide competition in running by accepting and managing entries for our events and checking your personal and sensitive information to ensure you are entered into the correct category. This information may also be shared with third parties who manage event entries, if required.
- Develop and maintain our volunteers' qualifications, including sending email communications to volunteers to inform them of upcoming courses, renewal requirements and verify that jog leaders and coaches have completed any mandatory training.
- Ensure we can fulfil club activities by ensuring we have the information needed from our volunteers concerning availability
- Respond to and communicate with members regarding your questions, comments, support needs or complaints, concerns or allegations in relation to Glasgow Frontrunners. Where necessary we will use your personal information to investigate your complaint, suspend membership and take disciplinary action where appropriate.

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 email secretary@glasgowfrontrunners.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, volunteer or participant.

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 will analyse anonymised data to monitor club trends, collate statistics and award prizes to members at the annual awards ceremony.

We may also provide anonymised, aggregate membership data to other affiliate organisations such as Scottish Athletics, Jog Scotland or International Frontrunners.

Who we share your personal information with

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 our members or as required by law. We may also share personal information with our professional and legal advisors for the purposes of taking advice. We may be asked to pass on personal information to Scottish Athletics/Jog Scotland in connection to the club's affiliated status, and this will be processed in accordance with Scottish Athletics/Jog Scotland privacy policies. If we do share personal information with external third parties, we will only share such personal information strictly required and take reasonable steps to ensure that recipients shall only process the disclosed personal information in compliance with GDPR.

How we protect your personal information

Your personal and sensitive information is stored on our cloud-based filing system, Google Drive. It is accessed by members of the committee as required for the purposes set out above.

How long we keep your personal information

We will only keep your personal information for up to a maximum of three years after you leave the club. We will ask you to provide updated information annually in August of each year. If you do not renew your membership, your name will be removed from the club register. Anonymised membership data may be retained indefinitely.

Social media

Our members are responsible for ensuring their privacy on our social media channels, Facebook and Twitter. We will not tag members in photos, but members should be aware that they may be tagged by other members. We remind members that they should check their privacy settings to limit this if required.

Your rights

You can exercise any of the following rights by writing to us at secretary@glasgowfrontrunners.org.

Your rights in relation to your personal information are:

- You have a right to request access to the information that we hold about you by making a “subject access request”.
- If you believe that any of your personal or sensitive 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 us will be considered under applicable data protection legislation and will be responded to within one month from the date of contact. If you remain dissatisfied, you have a right to raise a complaint with the Information Commissioner’s Office at www.ico.org.uk.

Data Handling Procedures

This document is a guide to participants of our activities on how we manage data within the club.

Online Runners Form

Member Registration is only available through our website. The data is processed and stored on our website host Squarespace and then transferred to our cloud storage provider, Google, where the data is managed by the committee. You can read about Google’s Cloud based GDPR policy by visiting <https://cloud.google.com/security/gdpr/>

SquareSpace GDPR statement can be found by visiting: <https://support.squarespace.com/hc/en-us/articles/360000851908-GDPR-and-Squarespace>

In particular, we are satisfied by the measures they have put in place to secure data. On the first page we give a link to our privacy policy.

We collect:

- Contact details – name, phone number, email address
- Emergency contact – name, phone number, their relationship to you
- gender identity, gender status, address, date of birth, disability information, ethnic group, religion
- If you’re a Coach or Jog Leader we will ask for information about jog leading and coaching
- We ask runners to disclose relevant disability information as required to their jog leaders for your personal safety

A committee member (usually the club secretary) will process the membership data by checking payments have been made against each member, and adding the member to the club register.

The information, and any backups, is held on the club Google Drive, and accessible by the committee.

Personal data may occasionally be shared with members who have been co-opted to the committee per the constitution to allow them to carry out their co-opted duties and responsibilities. Access will be immediately revoked when no longer required.

Anonymised membership statistics may be passed to Scottish Athletics during the annual affiliation process.

Club Kit

Kit can be ordered through our website and the data you provide is held by our web provider, SquareSpace.

In this form we collect

- Full Name
- Email
- Sizes and fit information
- Delivery address & contact number

Payment Information

When you purchase a club membership or kit, you will be transferred to our payment provider, Stripe, who process digital payments on our behalf.

Stripe will store details about your transaction with us in line with their privacy policy and local payment regulations. You can view their privacy statement here: <https://stripe.com/gb/privacy>

Payments to us should show on your bank statement as "Glasgow Frontrunners".

Registers

The club register is a list of the members of the club and Pay As You Go ("PAYG") members and is completed at each run by participants. We can gather statistical data about our attendance across the year and for your health and safety.

The register will be securely stored. Any analysis of the data will also be held on Google Drive and is password protected. Any paper forms we will securely store and destroy.

Mailing

During the registration process, we ask members if they would like to be emailed by us in the future. We will use an email client that will be certified for its compliance with the EU-U.S. Privacy Shield Framework. You can request to read about their GDPR policy by contacting comms@glasgowfrontrunners.org

Jog Leaders

Our Jog Leaders will be asked to regularly complete a form asking for their availability. This data is only accessible to those involved in jog leading and club management.