



**THE SCOTTISH FOOTBALL ASSOCIATION LIMITED**

**PRIVACY POLICY AND USE OF YOUR PERSONAL INFORMATION**

**FOR**

**EVENT PARTICIPANTS**

**1 INTRODUCTION**

The Scottish Football Association Limited (Scottish FA) respects your privacy and is committed to protecting your personal data, being transparent about how it handles your personal information, ensuring the security of your personal information and to meeting its data protection obligations. This privacy policy will inform you about how we look after your personal data, your privacy rights and how the law protects it. The Scottish FA collects and processes personal information, or personal data, relating to Event Participants to manage our relationship. This personal information may be held by the Scottish FA on paper or in electronic format.

In this privacy notice, "Data Protection Legislation" means all applicable legislation which relates to the protection of individuals with regards to processing personal data, including the Data Protection Act 2018, the General Data Protection Regulation (EU) 2016/679, and the Privacy and Electronic Communication Regulations 2003.

**2 IMPORTANT INFORMATION AND WHO WE ARE**

THE SCOTTISH FOOTBALL ASSOCIATION LIMITED which has its registered office at Hampden Park, Glasgow G42 9AY with Company Number SC005453 is the data controller and responsible for your personal data.

When we talk about "we," "our," or "us" in this Policy, we are referring to The Scottish FA. Please address any correspondence for the attention of the Data Protection Officer or e-mail [DPO@Scottishfa.co.uk](mailto:DPO@Scottishfa.co.uk).

We have notified the Information Commissioner's Office that we are a data controller under registration number Z7099905. This means that we are responsible for deciding how we hold and use personal information about you. We are required under Data Protection Legislation to notify you of the information contained in this privacy notice. Our contact details are set out at section 16 below.

**3 DEFINITION**

An Event Participant is defined as a person, appointed by the Scottish FA to fulfil a role included but not limited to those described in clause 4.

## **4 WHO DOES IT APPLIES TO?**

This notice applies to Event Participants in the following roles, whose personal data is processed by us:

- i) Delegate Liaison Officers;
- ii) Referee Liaison Officers;
- iii) Referee Observers;
- iv) Referee Masseur/Physio;
- v) Team Liaison Officers;
- vi) Scottish Cup Delegates;
- vii) Doping Control Chaperones; and
- viii) Emergency/Crowd Doctors.

It is important that you read this notice, together with any other Privacy Notice we may provide on specific occasions when we are collecting or processing personal data about you, so that you are aware of how and why we are using such information.

## **5 DATA PROTECTION PRINCIPLES**

We will comply with Data Protection Legislation. This says that the personal data we hold about you must be:

- (a) Used lawfully, fairly and in a transparent way;
- (b) Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes;
- (c) Relevant to the purposes we have told you about and limited only to those purposes;
- (d) Accurate and kept up to date;
- (e) Kept only as long as necessary for the purposes we have told you about; and
- (f) Kept securely.

## **6 INFORMATION THAT WE COLLECT FROM YOU**

We will collect your personal data when you or your organisation provide your details directly to us in connection to you carrying out one of the functional roles listed above.

### **6.1 What is personal data?**

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data from which an individual can no longer be identified (anonymous data)

### **6.2 What personal data do we collect from you?**

We may collect, use, store and transfer the following different kinds of personal data about you:

Personal:

- full name;
- title;
- addresses;
- organisation address;
- telephone numbers;
- email addresses; and

- driving licence information.

Financial Data:

- bank account details (for the purpose of expenses remuneration).

## **7 HOW WE USE YOUR PERSONAL DATA**

### **7.1 What processing grounds do we rely on?**

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data as it is necessary to perform the contract which we have entered into with you. This involves processing your personal data for the purposes of properly administering the event you are participating in.

Where necessary, we may also rely on the following grounds to process your personal data:

- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests; and
- Where we need to comply with a legal or regulatory obligation.

We may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data.

### **7.2 How do we use your information?**

We will primarily use your information for the purpose of your participation in events. The information we hold and process will be used for our management, administration and statistical analysis. We will keep and use it to enable us to manage our relationship with you effectively, lawfully and appropriately during your involvement with us and for a period of time after the event.

In particular, we shall use your personal data for the following purposes:

- communicating with you when necessary to administer your appointment and role at the event;
- for the preparation and participation in match day events;
- remuneration of expenses;
- insurance purposes for hire cars;
- communicating with opposition teams, delegates, observers, security officers, match officials, liaison officers, UEFA and FIFA to make them aware of respective individuals; and
- maintaining our records

If you do not provide the data, we may be unable in some circumstances to comply with our obligations and we will tell you about the implications of that decision.

## **8 MARKETING**

We will not send any direct marketing emails to any of the Event Participants. The Scottish FA shall only send "service" emails where required for the purposes of providing important information about the event and such emails as necessary for the purposes of fulfilling our contract with you, or where it is in our legitimate interests to send such "service" emails.

## **9 DISCLOSURE OF YOUR INFORMATION**

The information you provide to us will be treated as confidential. However, we may disclose your information to other third parties who act for us for the purposes set out in this Notice.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

We share Event Participant's details with the following for the purposes listed at clause 4

- (a) The Scottish FA's bank;
- (b) Opposition teams;
- (c) Delegates, Referee observers, security officers, match officials and liaison officers and
- (d) UEFA
- (e) FIFA

## **10 INTERNATIONAL TRANSFERS**

There may be occasions where it is necessary for us to transfer your personal data to countries which are not part of the European Economic Area (**EEA**) and where personal data is not afforded the same level of protection under the domestic laws.

Whenever we transfer your personal data out of the EEA, we shall ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- (a) We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission.
- (b) Where we use certain service providers, we may enter into the EU's "Model Contracts for the transfer of personal data to third countries". These are specific contracts approved by the European Commission which give personal data the same protection it has in Europe.
- (c) Where we use providers based in the US, we may transfer data to them if they are part of the Privacy Shield which requires them to provide similar protection to personal data shared between Europe and the US.

Where it is not possible to put in place any of the measures set out above, we will only transfer your personal data to a third country where you have given us your express consent to do so.

## **11 DATA RETENTION**

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

We may hold your personal information for longer where it is necessary to do so for the management of any active or potential legal proceedings, to resolve or defend claims, and for the purpose of making any necessary remediation payments.

## 12 DATA SECURITY

We have put in place measures to protect the security of your information. Details of these measures are available upon request. We limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality. We have also put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

## 13 YOUR RIGHTS

The Event Participant has various rights in respect of the personal data we hold about them – these are set out in more detail below. If the Event Participant wishes to exercise any of these rights, or for more information about the rights, please contact us by emailing [dpo@scottishfa.co.uk](mailto:dpo@scottishfa.co.uk).

- **Access to personal data:** The Event Participant can request access to a copy of the personal data that we hold about them, along with information about why we use it, who we share it with, how long we keep it for and whether it has been used for any automated decision making. You can make a request for access free of charge.
- **Right to object:** You can object to our processing of the Event Participant's personal data where we are relying on a legitimate interest (or the legitimate interests of a third party) to process the personal data and there is something about their particular situation which makes the Event Participant want to object to processing on these grounds.
- **Consent:** In the majority of circumstances, we won't need consent to use the Event Participant's personal data as we will be using it only to fulfil our obligations. There are limited circumstances where we may ask for the Event Participant's consent to process their information. Where the Event Participant have given consent, they can withdraw it at any time.
- **Rectification:** The Event Participant can ask us to change or complete any inaccurate or incomplete personal data held about them.
- **Erasure:** The Event Participant can ask us to delete their personal data where it is no longer necessary for us to use it, or where we have no lawful basis for keeping it. Where we are required by law to keep certain information, we will be unable to delete such information.
- **Portability:** The Event Participant can ask us to provide them or a third party with some of the personal data that we hold about them in a structured, commonly used, electronic form, so it can be easily transferred to a third party.
- **Restriction:** The Event Participant can ask us to restrict the personal data we use about them where they have asked for it to be erased or where they have objected to our use of it.
- **No automated-decision making:** Everyone has a right to challenge a decision made by automated decision-making, which takes place when an electronic system uses personal data to make a decision without human intervention. The Scottish FA does not use any automated decision making as part of your participation in events. .

If you would like to exercise any of your rights above, please contact us by email to [dpo@scottishfa.co.uk](mailto:dpo@scottishfa.co.uk). We may need to request specific information from you in order to verify your identity and check your right to access the personal information or to exercise any of your other rights. This is a security measure to ensure that your personal information is not disclosed to any person who has no right to receive it.

#### **14 MAKE A COMPLAINT**

If you believe that we have not complied with your data protection rights, you have the right to make a complaint to the Information Commissioner's Office (ICO) at any time. The ICO is the UK supervisory authority for data protection issues, at <https://ico.org.uk/>.

#### **15 CHANGES TO OUR PRIVACY NOTICE**

We may amend this Notice from time to time and we will provide a new fair processing notice when we make any substantial updates.

#### **16 CONTACT US**

If you have any questions about this fair processing notice, including any requests to exercise your legal rights or making a complaint to us about how we have used your personal data, please contact us by emailing [dpo@scottishfa.co.uk](mailto:dpo@scottishfa.co.uk), or by writing to us at:

Data Protection Officer,  
The Scottish Football Association,  
Hampden Park,  
Glasgow,  
G42 9AY.