



THE SCOTTISH FOOTBALL ASSOCIATION LIMITED

PRIVACY POLICY AND USE OF YOUR PERSONAL INFORMATION

FOR

SCHOOL OF FOOTBALL

1 INTRODUCTION

The Scottish FA is committed to protecting personal data. This privacy notice will inform you about how the Scottish FA's School of Football programme uses and protects the personal data of participants in the School of Football programme. You have received a copy of this Privacy Notice as you are listed as the parent or guardian of a participant in the School of Football programme.

In this Notice, **Data Protection Legislation** means all applicable legislation which relates to the protection of individuals with regards processing personal data, including the General Data Protection Regulation (EU) 2016/679.

It is important that you read this privacy notice together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about participants so that you are fully aware of how and why we are using their data.

2 IMPORTANT INFORMATION AND WHO WE ARE

We are what is known as a "data controller" of the participant's personal data. When we say "we" or "us", we mean **THE SCOTTISH FOOTBALL ASSOCIATION LIMITED** which has its registered office at Hampden Park, Glasgow G42 9AY with Company Number SC005453 is the controller and responsible for your personal data.

We have notified the Information Commissioner's Office that we are a data controller under registration number Z7099905.

3 INFORMATION THAT WE COLLECT

3.1 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).

3.2 What personal data do we collect from you?

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

- full name;
- residential address;
- gender;
- parent / guardian full name;
- parent / guardian contact information (including email address and telephone number);
- school;
- school year group;
- Equal Opportunity information, including information on your gender, sexual orientation, ethnicity, age, religion and details of any disability that you may have.

4 HOW IS YOUR PERSONAL DATA COLLECTED?

We will collect the participant's personal data directly from the participant or their parent or guardian.

This is generally when the participant or their parent / guardian fills in an application form to participate in the Scottish FA's School of Football programme (including information that is gathered on consent forms which permit the use of photography and excursions in relation to the School of Football).

5 HOW WE USE YOUR PERSONAL DATA

5.1 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 the participant. This involves processing the participant's personal data for the purposes of properly administering the School of Football programme, assessing a participant's participation the programme.

Where necessary, we may also rely on the following grounds to process participant's 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.

5.2 How do we use your information?

We will primarily use your information for the purpose of administering the School of Football programme, and for the purposes of securing funding for the programme from the Scottish Government (see paragraph 7.1 for more details).

For participants who excel on the programme, we may look to create a case study on these individuals and tell their story which would also be forwarded to the Scottish Government.

6 **MARKETING**

We will not send any direct marketing emails to participants in the Scottish FA's School of Football programme and shall only send "service" emails where required for the purposes of providing important information about the School of Football programme and such emails are necessary for the purposes of fulfilling our contract with the participant, or where it is in our legitimate interests to send such "service" emails.

7 **DISCLOSURE OF YOUR INFORMATION**

7.1 **Disclosure to selected third parties**

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 or for purposes approved by you, including to suppliers who provide marketing, financial, cloud computing and ticketing services.

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 participant's details with the following third parties:

Youth Scotland: We will share the participant's personal data with Youth Scotland, who shall act as a separate data controller of the participant's personal data for the purposes of assessing the participant's compliance with Youth Scotland's Dynamic Youth Award scheme and to determine the level of award which the participant is entitled to. For these purposes, the Scottish FA shall share with Youth Scotland the participant's: i) full name; ii) school; iii) school year group; and iv) date of birth.

Scottish Government: As the programme is funded by the Scottish Government, we will be required to share data with them around the number of participants in the programme to secure the necessary funding for the programme.

For participants who excel on the programme, we may look to create a case study on these individuals and tell their story which would also be forwarded to the Scottish Government.

Blake Stevenson Limited: In connection with our funding from the Scottish Government, we are required to meet certain diversity and demographic targets. We are required to share some information with an external evaluation company – Blake Stevenson Limited (company number SC140770) – who complete an audit on behalf of the Scottish Government to ensure that we are meeting our funding targets. Information shared with Blake Stevenson shall be anonymised where possible.

7.2 **Transferring data outside of the EEA**

We may need to transfer a participant's personal data outside of the European Economic Area (**EEA**) to service providers, agents, subcontractors and regulatory authorities in countries where data protection laws may not provide the same level of protection as those in the EEA, such as the USA. Whenever we transfer personal data out of the EEA, we shall ensure a similar degree of protection is

afforded to it by taking steps to ensure that appropriate safeguards is implemented in accordance with the Data Protection Legislation.

8 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.

9 THE PARTICIPANT'S RIGHTS

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

- **Access to personal data:** The 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 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 participant want to object to processing on these grounds.
- **Consent:** In the majority of circumstances, we won't need consent to use the 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 participant's consent to process their information. Where the participant have given consent, they can withdraw it at any time.
- **Rectification:** The participant can ask us to change or complete any inaccurate or incomplete personal data held about them.
- **Erasure:** The 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 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 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 use any automated decision making as part of its School of Football programme.

10 CHANGES TO OUR PRIVACY NOTICE

We may amend this Notice from time to time. If we make any substantial changes we will notify you by email.

11 YOUR DUTY TO INFORM US

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

12 CONTACT US

12.1 Contact Details

If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact us by emailing dpo@scottishfa.co.uk.

12.2 Making a complaint

You can make a complaint to us by emailing dpo@scottishfa.co.uk, or to the data protection supervisory authority, the Information Commissioner's Office, at <https://ico.org.uk/>.