



**THE SCOTTISH FOOTBALL ASSOCIATION LIMITED**

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

**FOR**

**FOOTBALL DEVELOPMENT**

## **1 INTRODUCTION**

The Scottish FA respects your privacy and is committed to protecting your personal data. This privacy notice will inform you about how the Scottish FA's Football Development Department uses and protects your personal data.

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 you so that you are fully aware of how and why we are using your data.

## **2 IMPORTANT INFORMATION AND WHO WE ARE**

We are what is known as a "data controller" of your 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. This means that we are responsible for deciding how we hold and use personal information about you. Our contact details are set out at section 13 below.

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

### **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 different kinds of personal data about you which we have grouped together follows:

- **Identity Data:** includes first name, maiden name, last name, username or similar identifier, marital status, title, date of birth and gender;
- **Contact Data:** includes billing address, delivery address, email address and telephone numbers;
- **Club Data:** includes information about any club with which you are affiliated, and your position within the club;
- **Financial Data:** includes bank account and payment card detail;
- **Transaction Data:** includes details about payments to and from you and other details of products, tickets and services you have purchased from us;
- **Profile Data:** includes your SFA Live username and password, purchases or orders made by you, your interests, preferences, feedback and survey responses;
- **Competition Entry Data:** includes your name, address and email address and any other information you provide when entering a competition;
- **Equal Opportunity Data:** includes information on your gender, sexual orientation, ethnicity, age, religion and details of any disability that you may have;
- **Marketing and Communications Data:** includes your preferences in receiving marketing from us and our third parties and your communication preference;

#### 4 HOW IS YOUR PERSONAL DATA COLLECTED?

We will collect your personal data in a number of ways, including when you provide your details directly to us in connection with one of the purposes set out in this Notice (for example, as required for the purposes of properly administering the Quality Mark Award Scheme, or any relevant leagues);

- enrol in one of our Coach Education Course;
- register to receive or download information, newsletters or other documentation;
- submit a nomination or vote in respect of any awards;
- sign up to attend any of our events;
- enter a competition, promotion or survey; or
- provide us with feedback
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#### 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 in the following circumstances:

- Where you have provided us with your consent to send you marketing communications;
- Where we need to perform the contract we are about to enter into or have entered into with you;
- 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.

Please note that we may process your personal information without your knowledge or consent, where this is required or permitted by law. Generally we do not rely on consent as a legal basis for processing

your personal data other than in relation to sending direct marketing communications to you via email. You have the right to withdraw consent to marketing at any time by contacting us.

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 following purposes:

- **Quality Mark Award Scheme:** where your club is enrolled in the Quality Mark Club Award Scheme, we will send you relevant information by email for the purpose of properly administering the scheme.
- **Girls' Youth League:** where you are a nominated contact for a club which participates in a Girls' Youth League we will send you relevant information by email for the purpose of properly administering the Girl's Youth Leagues (for example, information regarding league fixtures, League Management Committee updates, Discipline procedures).
- **Affiliated National Association Leagues:** where you are a nominated contact for a club which participates in an Affiliated National Association League we will send you relevant information by email for the purpose of properly administering the relevant leagues.
- **Walking Football:** Where you have registered to receive information on walking football via email communications.
- **Regional Committee Registers:**
- **Coach Education Courses:** where you have enrolled for one of Coach Education Courses, we will send you information by email and post which is relevant to your course (for example, confirming the dates of your training course, and providing you with relevant course materials). Where we have a legal basis to do so, we will send you marketing emails informing you of future courses which we are running.
- **Newsletter:** we will send you a newsletter providing you with relevant information on Scottish FA Football Development.
- **Marketing Communications:** Where we have your consent to do so, we may send you marketing emails and promotions which we think you will be interested in, including details of tickets and merchandise for the Scottish National Teams, tickets to club competitions. Further information is available in paragraph 6 below.

Where necessary, we may also use your information for the following additional purposes:

- as is required to ensure the safety of all those attending football matches and for the purposes of preventing crime;
- to monitor operational and safety related incidents;
- to apprehend and prosecute offenders, and provide evidence to take civil action in the courts; and
- to prevent fraud.

We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the

original purpose. If we need to use your personal information for an unrelated purpose, we will explain the legal basis which allows us to do so.

## **6        MARKETING**

### **6.1      Marketing by us**

We may use your personal data to send you marketing communications, providing you with details of upcoming training courses, events, competitions, and informing you of opportunities to purchase match tickets and merchandise.

You will receive marketing communications from us:

- a) if you have given us your express consent to receive marketing communications, or
- b) if you have purchased goods, services, tickets or a Scotland Supporters' Club membership from us and, in each case, you have not opted out of receiving that marketing.

### **6.2      Opting out**

You can ask us to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you or by contacting us at any time. Where you opt out of receiving these marketing messages, you may still receive messages from us for non-marketing purpose, for example, service messages providing important announcements regarding a match which you have purchased tickets for.

## **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 card 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.

### **7.2      Transferring data outside of the EEA**

We may need to transfer your information 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 your 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.

In some circumstances we may anonymise your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you.

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 SECURITY

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, 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.

## 10 YOUR RIGHTS

Under Data Protection Legislation, you have the right at any time to:

- Request access to your personal information (commonly known as a “**data subject access request**”). This enables you to receive a copy of the personal information we hold about you and to check we are lawfully processing it;
- Request correction of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected;
- Request erasure of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below);
- Object to processing of your personal information where we are relying on a legitimate interest (or those of a third party). You also have the right to object where we are processing your personal information for direct marketing purposes;
- Request the restriction of processing of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it;
- Request the transfer of your personal information to another party; and
- Withdraw your consent to the processing of your personal information at any time.

You will not have to pay a fee to exercise any of your rights.

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 try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

## **11 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 posting a prominent notice on our website or by email. Historic versions can be obtained by contacting us.

## **12 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.

## **13 CONTACT US**

### **13.1 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](mailto:dpo@scottishfa.co.uk).

### **13.2 Making a complaint**

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