

## Penicuik Rugby Football Club Data and Privacy Policy Statement

### What data do we collect and why? What do we do with those data?

We collect data relating to your membership of the club, playing details and records of transactions with the club (where relevant). We need these details so we can run the club in an effective and efficient manner.

If you are a player, we keep records of your **name**, your **date of birth** and your **unique Scottish Rugby Union player number**. We work with the Scottish Rugby Union to be able to identify each player actively playing rugby within Scotland. We also need to record names and dates of birth for youth players so we can be sure that we are placing those players in an age-appropriate group for training and games.

*Players names and unique SRU player number are also recorded on team sheets which are supplied to opposing teams, match officials and Scottish Rugby's competition organisers as required by the SRU's participation terms and conditions.*

If you are in any role within the club that requires you to work with children or vulnerable adults, we will keep records of your **name** and your **PVG certificate number**. Prior to your approval within such a role, we will request you fill in PVG application forms which we will pass to Disclosure Scotland via the SRU Child Protection contacts. In addition, if you are a coach and/or a qualified referee, we will record details of any **coaching/officiating qualifications** you may hold. Similarly, if you hold any **other qualification** of relevance to the operation of the club and which we may be required to produce in response to a reasonable request e.g. a First Aid or Food Hygiene qualification, we will record those details too.

We record **name, address, phone number(s)** and **email addresses** of all active club members where they have provided that information and we use this information to communicate with our members for forthcoming events, games and other organisational activities etc going on at the club. We may occasionally post or deliver information/items too.

For players under the age of 18, we request and record **emergency contact details** of parents/guardians or other named adults. We also request details of any **medical conditions that may be directly relevant** either in the event of an emergency, or in preventing an emergency from developing. We further request and record a series of **permissions** relating to the taking and displaying of **photographs, training and playing** with the club. *Some of the collected information may be passed to age grade coaches so that in emergencies, we can contact parents/guardians of youth players.*

*A list of the club's Full, Joint, Patron, Junior and Life Members who have paid all subscriptions due for the year will be made available for inspection at the club. This is necessary in case of a query on behalf of the licensing authority to confirm compliance with the conditions of our club alcohol licence. A further list of Full, Joint and Life members is made available at the AGM to confirm voting rights. These latter lists are provided in hard copy, printed form.*

Lists of members (and other information) are produced for a number of legitimate uses for the club such as merchandise orders, International ticket orders, ticketing for events. In the case of

International match tickets, we are required under the terms of sale, to pass to the SRU on demand the names and contact details of any club members supplied with those tickets.

### How long do we keep data for?

Player details are retained by the SRU and are subject to their retention policy. We will maintain records of team composition indefinitely as this forms part of the history of the club.

Likewise, we will retain records of the names of club members indefinitely. Again, such records form part of the history of the club. In addition, we need records of club membership so we can arrange re-unions and other social rugby events for current and past club members. Retaining these data also allows us to monitor and analyse trends which is necessary for managing and improving the club.

We will retain addresses and other contact details for up to 10 years. Again, these allow us to contact former club members for the purposes of arranging re-unions.

Records older than this will be deleted from the spreadsheets in which they are recorded by the Membership Secretary/Treasurer.

We will retain records of the purchase of International match tickets for a period of 5 years. This again allows us to monitor trends and to manage our interactions with the SRU better. It also allows us to prioritise the allocation of scarce tickets based on accurate data relating to previous purchases. Records older than this will be deleted from the spreadsheets in which they are recorded by the club Ticket Officer.

We will retain Permissions Forms/emergency contact details for the current season and until an updated form is provided or until membership ceases. Records will be shredded and disposed of securely by the Child Protection Officer and/or the Membership Secretary.

Identity documents supplied in support of PVG applications will be retained by the Child Protection Officer until such time as they are no longer required (PVG approval is received or the application is withdrawn). At that point, they will be shredded and disposed of securely.

You may request a copy of all information the club holds on you by emailing that request to the club Secretary.

You may also request that the details held by the club that relate to you be removed or corrected at any time. We will comply with any such request as soon as practically possible. However, this may impact on our ability to efficiently communicate with you on club matters and we may decline to remove certain records where doing so would compromise our ability to maintain a record of indisputable fact relating to the history and functioning of the club.