**Privacy Policy**

This is the Privacy Policy for Elgin Amateur Athletics Club (EAAC). Processing of your personal information is carried out by or on behalf of the EAAC a Scottish Charity Incorporated Organisation (SCIO) registered as a charity in Scotland (SC049165) with OSCR (Official Scottish Charity Regulator). Our Policy is provided for the provision of EAAC.

EAAC is committed to protecting your personal information and being transparent about what we do with it, no matter how you interact with us. This Privacy Policy applies to every person we require personal information from.

We are committed to using your personal information in accordance with our Data Protection laws. We are required to provide you with the information in this Privacy Notice under applicable law which includes:

* the Data Protection Act 1998, which will be replaced by the General Data Protection Regulation (EU) 2016/679 from 25 May 2018
* the Privacy and Electronic Communications (EC Directive) Regulations 2003.

We will only use your information in a way that you have consented to.

This notice, together with our websiteinforms you about how we collect, use and protect your personal information.

What information we might collect

When you engage with us by phone, mail, in person or online, we may collect personal information about you. For the purposes of this Privacy Policy, ‘personal information’ may include the following:

* your name
* address
* email address
* telephone number
* date of birth
* Job title
* Details of your education and career
* Why you are interested in Elgin Amateur Athletics Club
* Other information relating to you personally which may choose to provide to us.

Data protection laws recognise that certain types of personal information as sensitive. This is known as 'sensitive' or 'special category' personal information and covers information revealing racial or ethnic origin, religious or philosophical beliefs and political opinions, trade union membership, genetic or biometric data, information concerning health or data concerning a person's sexual orientation.

Sensitive information will only be collected where necessary, for example, we may need to collect health information from you when you register to attend our programme of activities, events or to deliver a community service as a volunteer or member of staff. Clear notices will be provided at the time we collect this information, stating what information is needed and why.

With your explicit consent, we may also collect sensitive personal information if you choose to tell us about your experiences relating to our services for use in a case study.

If you're aged 16 or under, you must get your parent/guardian’s permission before you provide any personal information to us.

Should you have any queries about our Privacy Notice, please get in touch in person or email:- info.elginaac@gmail.com

**How and when we collect information about you**

When you directly give us information

We may collect and store information about you when you interact with us. This includes, but is not limited to, when you do the following:

* participate in our training
* give us feedback
* make a complaint
* register as a volunteer
* entering into a partnership with us
* are captured by CCTV recording
* fundraise on our behalf
* register for an event
* case studies
* submit an enquiry

When you indirectly give us information

When you interact with us on social media platforms such as Facebook, Twitter or Instagram we may also obtain some personal information about you. The information we receive will depend on the privacy preferences you have set on each platform and the privacy policies of each platform. To change your settings on these platforms, please refer to their privacy notices.

We may obtain information about your visit to our website for example, the pages you visit and how you navigate the site, by using cookies.

If you're aged 16 or under, you must get your parent/guardian’s permission before you provide any personal information to us.

How and why we use your information

We need some personal information before we can provide our services to you. In some case we won’t be able to provide services to you if we don’t have all the personal information we need. Specifically, we will use your personal information for the following purposes:

* **Donation processing**: We will process personal information you provide in order to administer any one-off or on-going donations you make and claim Gift Aid.
* **Responding to a request**: If you contact us with a query, we may use your personal information to provide you with a response.
* **Fundraising or direct marketing**: We will only send you marketing information by email if you have given us specific consent for this purpose. If you withdraw your consent and then subsequently opt-in to receive marketing information again, then your most recent preference may supersede.
* **Monitoring and Evaluating**: We may use your information in order to improve current and future delivery of our services.
* **Processing an application to work with us**: We may process your information if you send or fill in an application form or send us your CV or details in respect of an opportunity to work with us in order to evaluate your suitability and respond to you.
* **Transactional purposes**: We will need to use your personal information in order to carry out our obligations arising from any contracts entered into between you and us for goods or services, for example, processing your order and payment.
* **Providing and developing our website**: We may use your personal information to help provide you with access to our website, personalise your experience, and improve and develop further.
* **Administration**: We may use your personal information to record and deal with a complaint, record a request not to receive further marking information, record what our volunteers have done for us, and for other essential internal record keeping purposes.
* **CCTV recording**: There will be CCTV in operation within the Moray Sports Centre. This will be for the purposes of safety and wellbeing of their team and customers.
* **Protecting your vital interests**: We may process your personal information where we reasonably think that there is a risk of serious harm or abuse to you or someone else.
* **Market research and surveys**: We may invite you to participate in surveys or market research to help us improve our website, fundraising, services and strategic development. Participation is always voluntary and no individuals will be identified as a result of this research unless you consent to us publishing your feedback.
* **Legal, regulatory and tax compliance**: Where required we are subject to a legal obligation, we may process your personal information to fulfil that obligation.
* **Profiling and analysis**: We may occasionally for the purposes of our legitimate interests use your personal information to conduct profiling of our supporters or potential supporters. This will help us target communications in a more focused, efficient and cost-effective way, helping us reduce the chances of supporters and potential supporters receiving inappropriate or irrelevant communications. You can object to such use of your personal information for profiling at any time by contacting us at the details set out at the end of this Privacy Notice.

Our profiling and analysis activities can be broken into five categories:

***1. Data matching***

We may combine the personal information you have given us with data obtained from external sources, such as the Office for National Statistics, to infer the likely social, demographic and financial characteristics, so we can tailor our communications and services to better meet your needs or the needs of others like you based on the insight we gain from the profile we build. We will not use the results of this data matching activity in a way that intrudes on your privacy or your previously expressed privacy preferences.

***2. Segmenting***

We conduct an analysis of audience by group, postcode or particular area where public may be based. This is to ensure that campaigns or mailings are sent to those who will be most interested or likely to respond. This type of activity is not aimed at identifying specific individuals to target, but rather many individuals who may fall within a certain segment of supporters.

***3. Major sponsorship and partnership analysis***

We may carry out research to determine whether an individual could be a potential major donor. We may use publicly available information from third party sources such as but not limited to - Google; Companies House; published biographies and publicly available LinkedIn profiles. The type of information we collect can include:

* areas of interest
* history of giving to us and others
* how the individual is connected with us and others
* public information on any philanthropic activities.

***4. High-value event planning***

We may also use profiling to produce short biographies of people who are due to meet with our leadership or attend an event that we may be hosting. This helps our people to understand more about those we engage with and their interests or connection to us.

***5. Ethical screening and minimising risk***

As a registered charity, we are subject to a number of legal and regulatory obligations and standards. The public naturally expect charities to operate in an ethical and transparent manner and this is integral to developing high levels of trust and demonstrating our integrity.

This means that we may carry out appropriate due diligence of donors/partners, check donations and implement robust financial controls to help protect the charity from abuse, fraud and/or money laundering.

We may carry out background checks and due diligence on potential donors/partners or anyone planning on making a significant donation or gift before we can accept it.

We may also ethically screen supporters to minimise the risk of creating an association with an individual or group that conflicts with the standards we have set out in our overarching equality and diversity policy.

Who do we share your information with?

We will only use your information for the purposes for which it was obtained. We will not, under any circumstances, sell or share your personal information with any third party for their own purposes. You will not receive marketing from any other companies, charities or organisations as a result of providing your details to us.

We will only share your data in the following circumstances:

1.    Third party suppliers: We may need to share your information with data hosting providers or service providers who help us to deliver our services, activities, or funders. These providers will only act under our instruction and are subject to pre-contract scrutiny and contractual obligations containing strict data protection clauses.

2.    Where legally required: We will comply with requests where disclosure is required by law and for medical purposes. We may disclose your personal information to law enforcement agencies for the prevention and detection of crime or medical services to help with aiding treatment. We may also share your information with the emergency services if we reasonably think there is a risk of serious harm or abuse to you or someone else.

We always aim to ensure that personal information is only used by those third parties for lawful purposes in accordance with this Privacy Notice.

How we protect your information

We use technical and corporate organisational safeguards to ensure that your personal information is secure. We limit access to information on a need-to-know basis and take appropriate measures to ensure that our people are aware that such information is only used in accordance with this Privacy Notice.

We undertake regular reviews of who has access to information that we hold to ensure that your information is only accessible by appropriately trained team, volunteers and contractors.

Our online forms are always secure and our network is protected and routinely monitored.

If you use your credit or debit card to donate to us, buy something or make a booking online your card details are passed securely to our payment processing partners. We do this in accordance with industry standards and do not store the details on our website.

Please be aware that there are always inherent risks in sending information by public networks or using public computers and we cannot 100% guarantee the security of data (including personal information) disclosed or transmitted over public networks.

Vulnerable circumstances

We understand that additional care may be needed when we collect and process the personal information of vulnerable supporters and volunteers. In recognition of this, we observe good practice guideline in our interactions with vulnerable people.

How long will we keep your information?

We will keep your personal information in respect of financial transactions for as long as the law requires us.

If you request that we stop processing your personal information for the purpose of marketing we may in some instances need to add your details to a suppression file to enable us to comply with your request not to be contacted.

In respect of other personal information, we will retain it for no longer than necessary for the purposes for which it was collected, taking into account guidance issued by the Information Commissioner’s Office.

**Your rights to your personal information**

Access to your personal information

You have the right to request access to personal information about you which is processed by the EAAC.

* **Rectification**

You have the right to request that any inaccuracies or incomplete information we hold on you is corrected.

* **Erasure**

You have the right to ask us to erase your personal information where it is no longer necessary for us to use it, you have withdrawn consent, or where we have no lawful basis for keeping it.

* **Restriction**

You can request we restrict our processing of your personal information or to object to our processing of your personal information.

* **Portability**

You can ask us to provide you or a third party with some of the personal information that we hold about you in a structured, commonly used, electronic form, so it can be easily transferred.

If you wish to exercise these rights, please contact us and provide any information that is relevant to the nature of your previous contact with us, as this will help us to locate your records.

You can send us your request via email:- info.elginaac@gmail.com or in person.

We will respond within 30 days, on receipt of your written request and copies of your identification documents.

How to make a complaint or raise a concern

If you would like more information or have any questions about this policy, to make a formal complaint about our approach to data protection or raise privacy concerns please contact:- info.elginaac@gmail.com

If you would like to make a complaint in relation to how we have handled your personal information, please follow **our complaints procedure.** If you are not happy with the response you receive, then you can raise your concern with the relevant statutory body:

* Information Commissioner’s Office, Wycliffe House, Water, Lane,Wilmslow, Cheshire, SK9 5AF.

Changes to our Privacy Notice

We reserve the right, at our sole discretion, to update, change or replace any part of this Policy by posting updates and changes to our website. It is your responsibility to check our website periodically for changes. Your continued use of or access to our website or our services following the posting of any changes to these Privacy Policy constitutes acceptance of those changes.