

## SCOTTISH CARRIAGE DRIVING ASSOCIATION

### PRIVACY NOTICE FOR OUR MEMBERS

January 2023

We are committed to respecting your privacy. This notice is to explain how we may use personal information we collect before, during and after your membership with us. This notice explains how we comply with the law on data protection and what your rights are. For the purposes of data protection we will be the controller of any of your personal information. We may also be the processor.

This notice applies to you if you are either:

1. a member of Scottish Carriage Driving Association (SCDA);
2. a member of another driving club affiliated to British Carriagedriving;
3. a former member of Scottish Carriage Driving Association (SCDA) or of another driving club affiliated to British Carriagedriving.

References to **we**, **our** or **us** in this privacy notice are to SCDA Limited, Company Number SC068249, registered office: Springfield Farm, Biggar ML12 6NP.

We have not appointed a Data Protection Officer to oversee our compliance with data protection laws because we are not required to do so. We have, however, appointed a Data Protection Compliance Manager who has overall responsibility for data protection compliance in our organisation.

Contact details are set out in the "**Contacting us**" section at the end of this privacy notice.

#### 1. **PERSONAL INFORMATION WE MAY COLLECT FROM YOU**

When you sign up for membership with us, you will be asked to provide us with, or we may (at that time or after you have joined) obtain, **personal information** about you, such as information regarding your:

- o personal contact details that allows us to contact you directly such as name, title, postal and email addresses and telephone numbers;
- o date of birth;
- o gender;
- o membership details including start and end date;
- o records of your interactions with us such as telephone conversations, emails and other correspondence and your instructions to us;
- o any disciplinary information;
- o any credit/debit card and other payment details you provide so that we can receive payments from you and details of the financial transactions with you;
- o use of and movements through our online portal, passwords, personal identification numbers, IP addresses, user names and other IT system identifying information;
- o records of your attendance at any events or training events approved by us;
- o images in video and/or photographic form and voice recordings; and
- o your marketing preferences so that we know whether and how we should contact you.

#### **Players/Participants**

If you are a driver or backstepper competing at events approved by SCDA, you may also be asked to provide us with, or we may obtain, the following additional **personal information** from you:

- details of any other club membership;
- details of next of kin, family members, coaches and emergency contacts;
- records and assessment of any assessments or gradings, competition results, details regarding events attended and performance including class progression;
- any details required for the purposes of awarding funding or grants.

### **Officials**

If you act as an Official for us you may also be asked to provide us with or, we may obtain, the following additional **personal information** from you:

- your current affiliated club or other organisation (if applicable);
- accreditation/qualification start and end date.

## **2. SPECIAL CATEGORIES OF PERSONAL INFORMATION**

We may also collect, store and use some or all of the following “**special categories**” of more sensitive personal information regarding you:

- information about your race or ethnicity, religious beliefs and sexual orientation;
- information about your health, including any medical condition, health and sickness records, medical records and health professional information
- in the case of para driving Athletes, details of their disability and permitted compensating aids.

In relation to any special category personal data that we do process we only do so on the basis that

- the processing is necessary for reasons of substantial public interest, on a lawful basis; or
- the processing is necessary for the establishment, exercise or defence of legal claims; or
- the processing is necessary for the purposes of carrying out the obligations and exercising our or your rights in the field of employment and social security and social protection law; or
- you have given your explicit consent.

In the table below, we refer to these as the “special category reasons for processing of your personal data”.

We may also collect criminal records information from you or about you. For criminal records history, we process it on the basis of legal obligations or based on your explicit consent.

## **3. WHERE WE COLLECT YOUR INFORMATION**

We typically collect personal information about our members (from the member and occasionally from third parties) when you join SCDA, when you enter an event organised by SCDA, when you purchase any services or products we offer online, when you make a query and/or complaint, when a complaint is made about you or when you correspond with us by phone, e-mail or in some other way including completing on surveys.

We also may collect personal information about you from any other driving club affiliated to British Carriagedriving.

If you are providing us with details of assessors, next of kin, family members and emergency contacts they have a right to know and to be aware of how what personal information we hold about them, how we collect it and how we use and may share that information. Please share this privacy notice with those of them whom you feel are sufficiently mature to understand it. They also have the same rights as set out in the “**Your rights in relation to personal information**” section below.

## **4. USES MADE OF THE INFORMATION**

We will process your personal information if we:

- Have asked you and have your express consent to do so; or
- Have a legitimate interest to do so in order to support the work we do; or
- Have a contract with you that we can only fulfil by using your personal information; or
- Have a legal obligation to use or disclose information about you.

- Have a basis under vital interests in relation to safeguarding of children and adults at risk.

The table below describes the main purposes for which we process your personal information, the categories of your information involved and our lawful basis for being able to do this.

<b>Purpose</b>	<b>Personal information used</b>	<b>Lawful basis</b>
<b><u>All Members</u></b>		
<b>To administer your membership with us and manage our relationship with you, including dealing with payments, dealing with support, service or event enquiries made by you and entering you for competitions</b>	All contact and membership details, transaction and payment information, records of your interactions with us, and marketing preferences.	This is necessary to enable us to properly manage and administer your membership contract with us.
<b>To arrange and manage any contracts or arrangements for the provision of events, training, merchandise, products and/or services.</b>	All contact and membership details. Transaction and payment information.	This is necessary to enable us properly to administer and perform any contract or arrangements for the provision of events, training, merchandise, products, services.
<b>To send you information which is included within your membership benefits package, including our newsletter and details about events and training</b>	All contact and membership details	This is necessary to enable us to properly manage and administer your membership contract with us.
<b>To send you other marketing information we think you might find useful or which you have requested from us, including information about Membership, events, participation products and information about our commercial partners</b>	All contact and membership details and marketing preferences	Where you have given us your explicit consent to do so.
<b>To answer your queries or complaints</b>	Contact details and records of your interactions with us	We have a legitimate interest to provide complaint handling services to you in case there are any issues with your membership.
<b>Retention of records</b>	All the personal information we collect	We have a legitimate interest in retaining records whilst they may be required in relation to complaints or claims. We need to retain records in order to properly administer and manage your membership and in some cases, we may have legal or regulatory obligations to retain records.  We only process special category personal data on the basis of the “special category reasons for processing of your

		<p>personal data” referred to in section 2 above</p> <p>For criminal records history we only process it on the basis of legal obligations or based on your explicit consent.</p>
<b>The security of our IT systems</b>	Your usage of our IT systems and online portals.	We have a legitimate interest to ensure that our IT systems are secure.
<b>To conduct data analytics studies to better understand event attendance and trends within the sport</b>	Records of your attendance at events or training	We have a legitimate interest in doing so in order to develop our sport and to ensure that our membership is targeted and relevant.
<b>For the purposes of promoting the sport, our events and membership packages.</b>	Images in video and/or photographic form.	Where you have given us your explicit consent to do so.
<b>To comply with health and safety requirements</b>	Records of attendance and any accident or incident reports	We have a legal obligation and a legitimate interest to provide you and other members of our organisation with a safe environment in which to participate in sport.
<b><u>Athletes and other participants</u></b>		
<b>To determine the winners of club trophies and awards and to determine class eligibility.</b>	<p>All performance and attendance data.</p> <p>Details of any other affiliated club membership.</p>	<p>This is necessary to enable us properly to manage and administer the sport.</p> <p>We only process special category personal data on the basis of the “special category reasons for processing of your personal data” referred to in section 2 above.</p>
<b>To administer any drug and alcohol testing</b>	Health and medical information	<p>This is necessary to enable us properly to manage and administer the sport.</p> <p>We only process special category personal data on the basis of the “special category reasons for processing of your personal data” referred to in section 2 above.</p>
<b>To use information about your physical or mental health (including any injuries) or disability status, to ensure your health and safety and to assess your fitness to participate, to provide appropriate adjustments to our sports facilities and to monitor and manage sickness absence</b>	Health and medical information	<p>This is necessary to enable us properly to administer the sport.</p> <p>We process special category personal data on the basis of the “special category reasons for processing of your personal data” referred to in section 2 above.</p>

<b>To gather evidence for possible disciplinary hearings</b>	All the personal information we collect including any disciplinary proceedings and grievance information.	We have a legitimate interest in doing so to provide a safe and fair environment for all members and to ensure the effective management of any disciplinary hearings, appeals and adjudications.  We only process special category personal data on the basis of the “special category reasons for processing of your personal data” referred to in section 2 above.  For criminal records history we process it on the basis of legal obligations or based on your explicit consent.
<b>To assess your eligibility for and to provide any training or other grants</b>	All details required for the purposes of awarding scholarship funding or grants (including any means testing)	This is necessary to enable us to properly administer and perform any contract for the provision of funding.
<b>For the purposes of equal opportunities monitoring</b>	Name, title, date of birth, gender, information about your race or ethnicity, health and medical information and performance data	We have a legitimate interest to promote a sports environment that is inclusive, fair and accessible.  We only process special category personal data on the basis of the “special category reasons for processing of your personal data” referred to in section 2 above.
<b>To comply with legal obligations, for example regarding being with children or vulnerable adults and to comply with our safeguarding requirements.</b>	Information about any criminal convictions and offences.	For criminal records history we process it on the basis of legal obligations based on your explicit consent.
<b><u>Coaches and officials</u></b>		
<b>To administer your attendance at any training courses or programmes</b>	All contact and membership details, transaction and payment data. Details of your current affiliated club or other, coaching/teaching qualifications and/or officiating history.	This is necessary to enable us to register you on to and properly manage and administer your development through the course and/or programme.
<b>To conduct performance reviews, managing performance and determining performance requirements. To make decisions about your progression and accreditation status</b>	All data and information about your performance and attendance at training events.  Details of your current affiliated club or other, coaching/teaching qualifications and/or officiating history.  Qualification start & end dates.	This is necessary to enable us to properly manage and administer your development through the training course and/or programme.  We only process special category personal data on the basis of the “special category reasons for processing of your personal data” referred to in section 2 above.

<b>To gather evidence for possible disciplinary hearings</b>	All the personal information we collect including any disciplinary proceedings.	<p>We have a legitimate interest in doing so to provide a safe and fair environment for all members and to ensure the effective management of any disciplinary hearings, appeals and adjudications.</p> <p>We only process special category personal data on the basis of the “special category reasons for processing of your personal data” referred to in section 2 above.</p> <p>For criminal records history we process it on the basis of legal obligations or based on your explicit consent.</p>
<b>To comply with legal obligations, for example, regarding people working with children or vulnerable adults to comply with our safeguarding requirements</b>	Information about any criminal convictions and offences	For criminal records history we process it on the basis of legal obligations or based on your explicit consent.
<b>To administer any drug and alcohol testing</b>	Health information	<p>We have a legal obligation and a legitimate interest to provide you &amp; other members of our organisation with a safe environment in which to participate in sport.</p> <p>We only process special category personal data on the basis of the “special category reasons for processing of your personal data” referred to in section 2 above.</p>

For some of your personal information you will have a legal, contractual or other requirement or obligation requiring you to provide us with your personal information. If you do not provide us with the requested personal information we may not be able to admit you as a member or we may not be able to properly perform our contract with you or comply with legal obligations and we may have to terminate your position as a member. For other personal information you may not be under an obligation to provide it to us, but if you do not provide it then we may not be able to properly perform our contract with you.

Where you have given us your consent to use your personal information in a particular manner, you have the right to withdraw this consent at any time, which you may do by contacting us as described in the "Contacting us" section below.

Please note however that the withdrawal of your consent will not affect any use of the data made before you withdrew your consent and we may still be entitled to hold and process the relevant personal information to the extent that we are entitled to do so on bases other than your consent. Withdrawing consent may also have the same effects as not providing the information in the first place, for example we may no longer be able to provide certain member benefits to you.

## 5. DIRECT MARKETING

**Email, post and SMS marketing:** from time to time, we may contact you by email, post or SMS with information about events, products and services we believe you may be interested in.

We will only send marketing messages to you in accordance with the marketing preferences you set. You can then let us know at any time that you do not wish to receive marketing messages by e mailing us at the address given below. You can also unsubscribe from our marketing by clicking on the unsubscribe link in the marketing messages we send to you.

## 6. DISCLOSURE OF YOUR PERSONAL INFORMATION

We share personal information with the following parties for the purposes outlined above:

- **Any party approved by you.**
- **British Carriagedriving and other Driving Clubs affiliated to British Carriagedriving**
- **Event Organisers of Events approved by British Carriagedriving or other clubs affiliated to British Carriagedriving**
- **The British Equestrian Federation and the FEI** to allow them properly to administer the sport on a national level and International.
- **Other service providers:** for example payment processors, promotional advisors, contractors or suppliers and IT services (including CRM, website, video- and teleconference services);
- Our supply chain partners & sub-contractors, such as couriers, import/export agents, shippers;
- **Our Commercial Partners:** for the purposes of providing you with information on any events, training, special offers, opportunities, products and services and other commercial benefits provided by our commercial partners where you have given your express for us to do so
- **The Government or our regulators:** where we are required to do so by law or to assist with their investigations or initiatives.
- **Police, law enforcement and security services:** to assist with the investigation and prevention of crime and the protection of national security;
- **British Carriagedriving's Insurers and brokers.**

We do not disclose personal information to anyone else except as set out above.

## 7. HOW LONG DO WE KEEP PERSONAL INFORMATION FOR?

The duration for which we retain your personal information will differ depending on the type of information and the reason why we collected it from you. However, in some cases personal information may be retained on a long-term basis: for example, personal information that we need to retain for legal purposes will normally be retained in accordance with usual commercial practice and regulatory requirements. Generally, where there is no legal requirement, we retain all physical and electronic records for a period of one year after your membership comes to an end. Exceptions to this rule are:

- Your competition record and results in the public domain will be retained indefinitely;
- Information that may be relevant to personal injury claims, or discrimination claims may be retained until the limitation period for those types of claims has expired. For personal injury or discrimination claims this can be an extended period as the limitation period might not start to run until a long time after the event;
- Information relating to Health & Safety issues affecting our sport will be anonymised after the end of the relevant limitation period and retained indefinitely.

It is important to ensure that the personal information we hold about you is accurate and up-to-date, and you should let us know if anything changes, for example if you change your phone number or email address.

You can update the personal information we hold about you by contacting us using by using the details set out in the "**Contacting us**" section below.

## 8. YOUR RIGHTS IN RELATION TO PERSONAL INFORMATION

You have the following rights in relation to your personal information:

- the right to be informed about how your personal information is being used;
- the right to access the personal information we hold about you;
- the right to request the correction of inaccurate personal information we hold about you;
- the right to request the erasure of your personal information in certain limited circumstances;
- the right to restrict processing of your personal information where certain requirements are met;
- the right to object to the processing of your personal information;
- the right to request that we transfer elements of your data either to you or another service provider; and
- the right to object to certain automated decision-making processes using your personal information.

You should note that some of these rights, for example the right to require us to transfer your data to another service provider or the right to object to automated decision making, may not apply as they have specific requirements and exemptions which apply to them and they may not apply to personal information recorded and stored by us. For example, we do not use automated decision making in relation to your personal data. However, some have no conditions attached, so your right to withdraw consent or object to processing for direct marketing are absolute rights.

Whilst this privacy notice sets out a general summary of your legal rights in respect of personal information, this is a very complex area of law. More information about your legal rights can be found on the Information Commissioner's website at <https://ico.org.uk/for-the-public/>.

To exercise any of the above rights, or if you have any questions relating to your rights, please contact us by using the details set out in the "**Contacting us**" section below.

If you are unhappy with the way we are using your personal information, you can also complain to the UK Information Commissioner's Office or your local data protection regulator. We are here to help and encourage you to contact us to resolve your complaint first.

#### 9. **CHANGES TO THIS NOTICE**

We may update this privacy notice from time to time. When we change this notice in a material way, we will update the version date at the bottom of this page. For significant changes to this notice we will try to give you reasonable notice unless we are prevented from doing so. Where required by law we will seek your consent to changes in the way we use your personal information.

#### 10. **CONTACTING US**

In the event of any query or complaint in connection with the information we hold about you, please email the SCDA Chairperson at [secretary@scda.co.uk](mailto:secretary@scda.co.uk) or write to us at Dalfibble, Parkgate, Dumfries DG1 3NF.

**Adopted on 20<sup>th</sup> January 2023**