### **Annan Rugby – Privacy Notice (Effective 2025)**

Annan Rugby is committed to protecting and respecting your privacy. This Privacy Notice outlines how we collect, use, store, and protect your personal information.

For the purposes of applicable data protection law, Annan Rugby is the Data Controller of your personal data and is responsible for ensuring that it is processed lawfully, fairly, transparently, and securely.

#### What Personal Data We Collect

You may provide personal data when:

- Completing a membership form (online or in person)
- Contacting us by phone, email, or post
- Participating in club activities or events

This data may include:

- Name, date of birth, postal address, email address, telephone number
- Emergency contact details
- Relevant health, disability, or medical information (special category data)
- Club role or playing position
- Payment details (for membership processing)

# Why We Need Your Personal Data

We collect and process personal data to:

- Administer your membership
- Deliver training and match opportunities
- Communicate with you about club activities and services
- Meet the regulatory requirements of governing bodies (e.g., SRU)

Our lawful basis for processing most of your personal data is contractual obligation – to provide the services and membership benefits you've registered for.

We may also rely on:

- Consent (for health data and communications beyond essential club updates)
- Legal obligation (e.g. safeguarding requirements)
- Legitimate interests (e.g. managing our club efficiently)

### **How We Use Your Personal Data**

For training, events and competition:

- Share with coaches and officials to run sessions safely
- Share with team managers for entry into matches or tournaments
- Share with leagues, regional bodies (e.g., SRU), and venues for access and compliance

For club operations and administration:

- Manage your membership application and payments
- Share updates on club activity, renewals, or social events
- Publish team sheets or match results (only where necessary and appropriate)

### For funding and insight:

- Provide anonymised data to funding partners (e.g. local authorities)
- Analyse anonymised membership trends
- Issue surveys to improve club experiences

For communications and marketing (where consent is given):

• Provide updates on events, fundraising, and club merchandise

# **Special Category Health Data**

We may collect limited health information to:

- Support safe participation in physical activity
- · Help coaches adapt training for medical needs
- Complete SCRUMS reporting in the event of a serious injury

We will only process this data with your explicit consent, which will be obtained at the time of data collection. You may withdraw consent at any time.

#### **Non-Member Data**

We may collect limited personal data from non-members (e.g. at taster sessions or open events). This data will be held for one week after the event, then securely deleted. This is processed only with your explicit consent.

### **Social Media**

Annan Rugby operates official pages on platforms such as Facebook and Twitter. These are subject to the privacy policies of the platform providers. We are not responsible for third-party privacy practices. Please review their policies before submitting data on those platforms.

#### Who We Share Your Data With

- When you join as a playing member or renew, your data will be shared with the Scottish Rugby Union (SRU) via their registration system SCRUMS.
- We do not share your personal data with third parties for marketing or other nonessential purposes.
- Your data will never be sold or transferred outside the UK without appropriate safeguards.

### **Data Retention**

- Your personal data is retained while you are an active member.
- If you leave the club or your membership lapses, your data will be retained for six years of inactivity, then deleted or anonymised unless otherwise required by law (e.g. safeguarding records).

Annual updates ensure the accuracy of your information.

# Your Rights Under UK GDPR

As a data subject, you have the right to:

- Access your data (Subject Access Request)
- Rectify inaccurate or incomplete data
- Request erasure ("Right to be forgotten")
- Restrict or object to processing in certain circumstances
- Data portability (if applicable)
- Withdraw consent (where consent is the basis for processing)
- Lodge a complaint with the Information Commissioner's Office (ICO)

# **Consequences of Not Providing Data**

You are not legally required to provide personal data to us. However, without certain essential information, we may not be able to process your membership or allow you to participate in club activities.

#### **Contact Us**

If you have any questions, wish to exercise your rights, or have a concern about data use, please contact:

Data Protection Lead Annan Rugby Club 17 Bank St Annan DG12 6AA