



University of
St Andrews

University privacy notice: Saints Sport

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Scope (applies to)	Public
Applicability date	17/04/2020
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Approved date	17/04/2020
Approver	Assistant Director (Commercial Operations)
Document Owner	Head of Information Assurance and Governance
School / unit	Saints Sport
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Information classification	Public
Equality impact assessment	None
Key terms	GDPR, DPA 2018
Purpose	This document outlines how the personal data of Saints Sport and affiliated sports club members is collected and used and shared.

Version number	Purpose / changes	Document status	Author of changes, role and school / unit	Date
3.0	Merge of sports centre and sports club privacy notices.	Live	Head of Information Assurance and Governance	01/05/25

1 How the University will make use of your personal data

- 1.1 The University is required to inform you how personal data collected by you will be used and to provide other information, including details of with whom personal data may be shared and your rights.

2 The identity and the contact details of the controller

- 2.1 University of St Andrews, College Gate, North Street, St Andrews, KY16 9AJ, Fife, Scotland, UK. The University is a charity registered in Scotland, No SC013532.

3 The contact details of the University Data Protection Officer

- 3.1 Mr Christopher Milne, Head of Information Assurance and Governance, University of St Andrews, Email dataprot@st-andrews.ac.uk

4 The purposes for which the University will make use of personal data

4.1 Administering your Saints Sport Membership

Your personal data is used:

- by Saints Sport to set-up and administer your Saints Sport membership (including membership of an affiliated University sports club, Junior Saints membership); which will involve creating a member record; to register you with any relevant sporting associations or bodies; to manage any disciplinary processes/investigations instigated by a club, sporting association/body or the Athletic Union.
- by sports club(s) committee, including office bearers who are elected/appointed from the student membership you have.
- by third-party partner organisations who provide services in conjunction with, or on behalf of, Saints Sport.

The personal data, which will be collected from you will include:

- your name
- date of birth
- contact details (address, email, telephone number)
- photograph
- confirmation if you do/do not hold other Saints Sport/Sports Club membership types
- information about your child/children (name, date of birth, address, medical information, disabilities – Junior Saints Memberships only)

4.2 Providing you with services

Your details will be used to prepare for and to provide you with:

- services from Saints Sport and third-party partner organisations i.e., to take and manage bookings. Staff from Saints Sport and/or the partner organisation may use your contact details to advise if changes to any prior booking arrangements are required
- services/events that a club may offer, either on its own or through the University Sports Centre and/or any other third parties engaged by the club/committee to provide those services.

The personal data, which will be collected from you will include:

- information about your bookings including date, time, and the name of your class/course
- information about other people in your booking when you make a booking on behalf of other people including children.

4.3 Advising you of services

Changes to Services: we will contact you to advise if there are any changes to services and/or their availability.

Saints Sport Memberships: Saints Sport may contact you (via email and other electronic means e.g., SMS text) without your consent to advise you of new services and facilities that you may be interested in, where those relate to services and facilities you have previously purchased a membership for. If you do not wish to be advised of services or facilities, please advise staff at Saints Sport and arrangements will be made so that no similar communication with you will take place, until such times as you choose otherwise. In all other instances we will seek your consent before advising you of the services we offer.

Sports Club Memberships: Club committees may contact you to advise you of events/services that you may be interested in that are offered by a club of which you are a member. The University Development Office may reach out to alumni who were sports club members to advise of events that may be of interest, including club reunions, dinners and other events that are run from time to time, where that is in your and the University's legitimate interests. If you do not wish to be advised of events/services, please advise the relevant club committee member and arrangements will be made so that no similar communication with you will take place, until such times as you choose otherwise. Similarly, if you have no interests when as an alumni in being contacted about club events, please advise the University Development Office.

4.4 CCTV

The Saints Sport facilities at University Park use CCTV cameras, for the protection of University property and resources, to provide a safe environment and for the purposes of crime prevention and

detection. Saints Sport may review CCTV footage to understand whether individuals have upheld conditions of membership and other rules/regulations that may apply to them, when using the facilities.

The University will retain customer/booking data for a period of 6 years, after which time records will be destroyed. CCTV footage will be destroyed (overwritten) after 30 days. Comment: CCTV will be deleted, video footage for performance analysis won't be.

CCTV footage may be made available to Police Scotland and/or insurance companies, where there are claims arising from vehicle incidents in University car parks, covered by CCTV facilities, and provision in the Data Protection Act 2018 allows for a transfer of imagery to be made.

4.5 Delivering film and photography

Fixtures, training, events, and activities may be recorded by Saints Sport for live streaming purposes – where filming and/or photograph is taken place there will be a notice at the event; if you do not wish to be filmed or photographed please contact a member of staff at the event, who may then advise where you can spectate without being filmed and/or photographed. If that is not possible you may opt to leave the event. Filming and photography may also be used to provide materials for our fixtures, training, events, and activities, which we use for promotional, coaching, education, sports analysis and/or developmental purposes. Again, prior notice of such will be given and you will have the opportunity not be filmed and/or photographed.

4.6 Improving our services

If you provide the University with feedback about your experiences of Saints Sport, we will use that information to improve our services.

5 **The legal bases for processing personal data**

5.1 **Saints Sport Memberships**

Contract

- Your personal data will be used to service the contract between members of Saints Sport or for preparation for entry into a contract. The University makes use of CCTV footage for protecting resources and safety purposes under its public task. Contract is the lawful basis used where use of CCTV footage is made to understand whether conditions of membership have/have not been breached; and to provide video imagery where members/teams have requested such for coaching/sports development purposes.

Consent

- For the filming activities outlined at 4.5, above, consent is the lawful basis for the collection and use of your personal data. Notices of filming are provided, and if you do not wish to feature, members of staff are available to assist. If assistance is not possible you then have the option to leave a venue, whilst filming is underway.

5.2 Sports Club Memberships:

Contract

- When using your personal data to create and administer your membership, to provide you with club services and to alert you to events/services being offered by a club.
- Where personal details are exchanged with third party sporting bodies/associations for purposes of managing membership with those bodies, which may include supporting investigations as to whether policy/regulation/articles of association of such a body have been upheld or otherwise.

Legitimate interests

- When using your personal details to advise you of alumni related sports club events. If you do not wish to receive details of those, please contact the Development Office, at any time; and

6 Who personal data may be shared with

Disclosure to for the purposes of	Details
University staff and or agents/suppliers of the University; to provide you with services and facilities through Saints Sport.	Booking details.
Sports Clubs affiliated to the University Athletic Union.	Membership and contact details, to support club memberships. Video recordings/imagery under prior arrangement for coaching/sports analysis.
The AU; to support any investigation and/or disciplinary process	Membership and contact details, and any details as necessary to support an investigation and/or disciplinary process

Sports associations/bodies; to register you with an external body where that is a requirement of club membership and to support any investigation and/or disciplinary process instigated by such an external body.	Membership and contact details, details of sporting achievements, and any details as necessary to support an investigation and/or disciplinary process
Third-party partner organisations who deliver services in conjunction with, or on behalf of, Saints Sport.	Name and contact details, details of courses enrolled onto, and other information required to provide the service.
The University Development Office; to provide alumni with details of club news, events and activities for former students.	Membership and contact details, and details of sporting achievements, committee positions held.

7 The period for which personal data will be stored, or if that is not possible, the criteria used to determine that period

- 7.1 **Saints Sport Memberships:** The University will retain customer/booking data for a period of 6 years, after which time records will be destroyed. CCTV footage will be destroyed (overwritten) after 30 days.
- 7.2 **Sports Club Memberships:** Information about your sports club membership(s) will be destroyed 6 years after any subscriptions have ended. Clubs may keep information about sporting honours and achievements in perpetuity, to support, celebrate and promote the history and sporting achievements. The University Development Office may retain details of your membership of a club/(s) for longer, to provide alumni with details of news and events, as described.

8 Rights available to individuals

- 8.1 European and UK data protection legislation provides individuals with a number of rights regarding the management of their personal data, in relation to guests making use of University accommodation your rights are:
- The right of access to your personal data, commonly referred to as a subject access request, which involves the following being carried out within a calendar month:
 - Confirmation that personal data is being processed.

- Access being given to your personal data (provision of a copy), unless an exemption(s) applies; and
- The provision of supplementary information e.g. an explanation of how your personal data is processed and who this is shared with.
- The right to rectification, which may involve:
 - The University working to correct any inaccuracies in personal data or to address any omissions, which may require personal data to be annotated to acknowledge that this is incomplete.
- The right to erasure (the deletion of personal data, in specific circumstances), which is commonly referred to as the right to be forgotten, which may involve:
 - The University destroying specific personal data. However, that right does not extend to guest registration records, as the University is required by law to collect and retain those details.
- The right to restrict processing, which may involve:
 - The University agreeing to stop making use of your personal data where those data are contested, in terms of accuracy.
- The right to data portability, which may involve:
 - The University providing you with a copy of elements of your personal data that exist in machine readable form that you have given to the University.
- The right to object. Individuals have the right to object to the University making use of contact details for direct marketing – in such circumstances the use of personal data must stop when an objection is received.

8.2 These rights have to be met by the University and any other organisation that takes decisions about how or why your personal data is used. Details on how to access those rights are available from the University website, or you can contact dataprot@st-andrews.ac.uk.

9 Where the University asks for your consent to make use of personal data

9.1 Saints Sport may ask you for your permission to be contacted in the future, via any contact details you have provided to:

- Provide you with details of services and offers – where you receive communications about such you can opt to stop receiving those at any time, please contact Saints Sport; and
- Ask you about your experiences as a member of Saints Sport, a user of the facilities provided by or through Saints Sport to help us improve the quality of our services and the experience of all Saints Sport and Sports Club Members.

- 9.2 Consent is optional. Individuals are under no compulsion to provide their consent, and where consent is provided, you will have the right to withdraw consent at any time, from which point the University's use of your personal data will stop.

10 The right to lodge a complaint with a supervisory authority

- 10.1 If you believe that the University has not made use of your personal data, in line with the requirements of the law, you have the right to raise this first with the University (please contact the University DPO at dataprot@st-andrews.ac.uk) and then with the regulator i.e. the UK Information Commissioner Office's ("the ICO").

Details on how to contact the ICO are available online, at:

- <https://ico.org.uk/global/contact-us/>

11 Contractual requirement to provide personal data and the consequence where no personal data are provided

- 11.1 In order to secure services as a member of Saints Sport or to secure club membership and access to the associated services/events, you must provide details about you and your preferred contact details in order to become a registered member.

12 Revision of the Privacy Notice

- 12.1 This Privacy Notice will be reviewed at regular intervals. The review period will be approved by the University and recorded on the accompanying coversheet. Any significant change to relevant legislation, University policy or procedures primarily concerned with the protection of personal data may trigger an earlier review.

13 Availability

- 13.1 This Privacy Notice will be published on the University website.

Should a copy of this Privacy Notice be required in another form, including orally i.e. an audio recording, please contact dataprot@st-andrews.ac.uk.

Version number	Purpose / changes	Document status	Author of changes, role and school / unit	Date
1.1	First version	Approved	Chris Milne, Head of Information Assurance and Governance, Principal's Officer	10/05/18
2.0	Second version – minor updates (video imagery for coaching etc.)	Approved	Chris Milne, Head of Information Assurance and Governance, Principal's Officer	17/04/20
3.0	Merge of sports centre and sports club privacy notices.	Live	Chris Milne, Head of Information Assurance and Governance, Principal's Officer	01/05/25