

**Roxburgh Reivers Orienteering Club  
DATA PRIVACY POLICY**

**General Data Protection Regulation (GDPR) 2018**

**Principles**

To comply with GDPR, Roxburgh Reivers has to meet certain privacy principles. These are:

*Personal data must be processed lawfully, fairly and in a transparent manner, must only be collected for “specified, explicit and legitimate purposes”, must be adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed, and must be accurate and where necessary kept up to date. Personal data that is no longer required should be deleted and processors should ensure all personal data they hold is secure.*

**Individuals’ Rights**

Individuals have rights regarding their data:

*The right to be informed, to access, to rectification, to erasure, to restrict processing, to data portability, to object, and rights relating to automated decision making and profiling.*

**Legal Basis**

Legal Basis for processing data:

Roxburgh Reivers can lawfully process data if:

*the data subject has given consent.*

*the processing is necessary for the performance of a contract (such as paying membership fee or entering an RR event)*

Details of usage must be notified to the UK Information Commissioner, with some exceptions which include not-for-profit organisations whose usage is restricted to specified purposes. Roxburgh Reivers is exempt from notification but the principles setting out rules and safeguards do apply.

The club does not hold any Special Category data (e.g. racial, ethnic origin, political opinion etc), and does not carry out any High Risk data processing (e.g. related to criminal conviction or offences).

**What data is kept, and where it comes from**

In the interests of being open and fair, Roxburgh Reivers wishes to inform members of the data held and how it is used.

The contact data or membership data may be obtained directly from an individual person or a family member or indirectly from the British Orienteering Federation, the Scottish Orienteering Association, other clubs or other organisations. Roxburgh Reivers and its officials may hold some or all of the following data about some or all members and others who compete in orienteering events.

British Orienteering’s concept of ‘**membership data**’ is:

*BOF will collect certain information about you which will include your name, date of birth, gender, email address, address, telephone number, name of the BOF affiliated Association and club that you are a member of and details of any coaching or officiating licenses you hold and results*

Scottish Orienteering Association will collect and hold similar information.

Contact data is held for landowners and other organisations with whom we co-operate with from time to time, their employees, agents and tenants. The data may be held in electronic or paper form.

Data may also be held assuming consent has been given, where the data subject has been interested in orienteering previously and wishes to be kept informed of the activities of the sport in the Scottish Borders. Data for these purposes will be held indefinitely or until consent is withdrawn.

**How the data is used**

The data is used for administrative purposes in organising the sport of orienteering and for social and other purposes, including, but not limited to, mailing of magazines and other literature, publication of competition entries and results, coaching, team selection, training and appointment of officials.

Data may be distributed in paper or electronic form between members, competitors and orienteering organisations. Publication of personal data in paper form may occur in membership and contact lists, magazines, competition information and results and other literature. Publication on publicly accessible web sites may include name, age class and club in competition results; names with offices and photographs may be published, but addresses, contact numbers and personal background details will be published only with the explicit consent of the person.

When organising events, data regarding members' results will be passed to other organisations to publish and the individual entering the event needs to be aware of this. To comply with the GDPR, entry details of Roxburgh Reivers events should include the following wording:

*"You agree that we may publish your Personal Information as part of the results of the Event and may pass such information to the governing body or any affiliated organisation for the purpose of insurance or for publishing results either for the event alone or combined with or compared to other events. Results may include (but not be limited to) name, any club affiliation, race times and age group."*

### **Limitation of use of data**

Other than for the purposes of establishing or maintaining membership of or support for Roxburgh Reivers and the sport of orienteering, or providing or administering activities for individuals who are either members of Roxburgh Reivers or who have regular contact with it, Roxburgh Reivers will not disclose personal data to any third party without the data subject's prior consent.

The data will not be available for commercial purposes.

### **Consent**

Prior to the GDPR coming in to force on 25<sup>th</sup> May 2018, persons for whom data is at present kept by Roxburgh Reivers will be asked whether they wish to give consent to their data being held by the Club and to continue receiving occasional communications relating to the activities of the Club. Where consent from non-club members is not forthcoming, data held will be deleted and no further communication made.

### **For how long is data kept**

Roxburgh Reivers will retain Membership Data for such time as a member is registered with us and will then delete information on a staged basis as follows:

**Membership Data** (except in respect of those specific items below)

*Five years after an individual has not played an active part in the sport.*

**Name and contact details**

*This information will be kept indefinitely, but may be deleted at any time at the request of the data subject.*

### **Contact us**

If at any time a person no longer wishes to receive mailings (by email, post or other means) or other non-administrative communications from Roxburgh Reivers or believes that the data held by Roxburgh Reivers is incorrect, please contact Roxburgh Reivers data protection officer, Lindsey Knox at [rrenquiries@roxburghreivers.org.uk](mailto:rrenquiries@roxburghreivers.org.uk)

This Data Protection Policy was reviewed and agreed by members of the Roxburgh Reivers Committee on the date given below:

Signed                      Andrew Armstrong  
   **Chairperson**

Date    11<sup>th</sup> April 2018