

# PRIVACY POLICY

This privacy notice provides information about how your personal data will be used by Acrobay Gymnastics Trust.

When we collect, use, share, retain or do anything else with your personal information (known collectively as 'processing') we are regulated under the General Data Protection Regulation (GDPR) and are responsible as 'controller' of your information.

This notice applies to you if you are:

- An existing or prospective member of our club;
- A person with parental responsibility for a member;
- An existing or prospective club volunteer or official; and

We have a separate notice which provides privacy information relating to employees. It is important that you read this carefully as it contains key information about how we use your personal data and your associated rights.

## About us

Acrobay Gymnastics Trust is a 'Scottish Charitable Incorporated Organisation. Our members are gymnasts or the parents (if the gymnast is a child). We provide the opportunity for our members to participate in our activities, which include recreational classes, training, camps, competitions, squads and other similar gymnastics activities.

We register with Scottish Gymnastics who governs the sport, provides membership benefits for clubs and individual members and offers competitions and events. It is a condition of Scottish Gymnastics club registration that all our club members also register as individual members of Scottish Gymnastics.

Acrobay Gymnastics Trust, Scottish Gymnastics and British Gymnastics are Joint Controllers for the personal data shared for Scottish Gymnastics membership purposes. You can find full details about how Scottish Gymnastics and British Gymnastics collect and use your personal data in the [Scottish Gymnastics privacy](#) and [British Gymnastics privacy](#) notices.

## Information we collect about you

The categories of personal data we process includes:

- name and parent name (if applicable)
- parent or gymnast contact details (telephone, email and postal address)
- gymnast date of birth
- gymnast gender

The above information is essential for us to provide your membership

# PRIVACY POLICY

- Emergency contact
- Any relevant medical conditions and/or disabilities and additional related information
- Other relevant individual needs for example, information about learning, religious or other support needs.
- Any individual risk assessments (gymnasts and other participants if applicable)
- Details of any reasonable adjustments or steps taken to support your individual needs
- Scottish Gymnastics membership details including your membership number, status and any coaching and training records (if applicable) (which are confirmed by Scottish Gymnastics when [you/we] register or renew your membership.
- Gymnast attendance
- Achievement records
- Any communications from, to or relating to you
- Details relating to standards of conduct
- Any accident or incident reports including details of injuries
- IP address, browser identifier and the time of access (if you use our website)
- Bank details (If you are making regular payments to us or we are making payments to you e.g. for volunteer expenses)
- Tax status (if you have agreed for us to claim gift aid on your donations).
- Experience, qualifications, training
- Confirmation that you have completed a criminal record check (for any prospective or existing volunteers who have completed a check via Scottish Gymnastics, this information will be provided via your membership account when you link it to our club).

If you are a competitive gymnast, we record other information about you to support your training and participation in competition such as:

- Training and technical information
- Lifestyle information
- Nationality (if you are competing at a certain level)

If you attend an event or trip with the club, we will also collect the following information where relevant:

- Dietary requirements and any other relevant information that we need to know to ensure your needs are met; and
- Passport information if the trip is abroad.
- Emergency Contact Details

# PRIVACY POLICY

## **Our purposes for processing information about you**

We use the information we hold about you for a variety of purposes which are outlined below. Data protection law requires us to tell you what our legal reason is for each purpose.

### **Contractual purposes**

When you ask us to provide you a service, such as club [membership or registration], gymnastics classes, competitions, trips or other activities [or you buy a product from us] we usually need to use information about you to provide this [product] or service, for example:

- To contact you to confirm arrangements
- To notify you about changes to terms and conditions
- To tell you when it is time to renew membership or re-register for activities
- To process payments or send you receipts required
- To provide you with the [product and] services

We do so because it is necessary for the performance of a contract.

### **Legal obligations**

We have a duty of care to ensure it is safe for you or your child to take part in gymnastics activity and to keep you/them safe while participating. Some individuals may be at risk of harm from participating in gymnastics activity as a result of a pre-existing condition. It is vital that you let us know if there is any reason why taking part in gymnastic activity may be unsafe prior to participation. With your agreement, we will review any information you provide and undertake risk assessments in consultation with yourself and any appropriate trained professionals e.g. medical consultants. When we ask participants to provide relevant health information such as details of medical conditions, medication needs, allergies or injuries, this is because we have a legal obligation.

If you are a selected for a role at the club, we will usually obtain a reference from any appropriate organisations or individual you have nominated.

When you tell us about any special needs such as disabilities or other support information, we may use relevant information to comply with our legal obligations under the Equality Act 2010. We will review any information you have provided to help us identify any actions we can take to support inclusion. We may need to ask you for more information to help us to best meet you or your child's needs. We will keep a record of any steps we taken to support inclusion.

If you are wishing to volunteer or work for us, we may ask you to complete a criminal record check as we have a legal obligation to do so. We jointly control the checking process with Scottish Gymnastics who is responsible for the assessment of any content on the check and will only share information with us where it is appropriate. For example, if you are considered by Scottish Gymnastics to be unsuitable to take on the role, we may share relevant and proportionate information about criminal offences where it is deemed that while you are not considered unsuitable to take on the role, if it is considered necessary for safeguarding purposes.

# PRIVACY POLICY

When we retain information about you, even after you are no longer taking part in gymnastics activity, this is often because we are required to do so by law such as records we are required to keep for business and accounting purposes. Sometimes we are also legally obliged to share information about you with third parties. More information it provided below.

## Legitimate interests

We rely on legitimate interests for the following purposes:-

- **Responding to communications, concerns or complaints and seeking feedback from you about our services.**

We will use the information you provide to respond to any comments or questions you raise and where appropriate to undertake investigations into any complaints or concerns. On occasion, we may contact you to seek your views on the services we provide.

- **Holding emergency contact information**

When you join the club, we collect contact details. We also ask you to provide an emergency contact which we will only use in exceptional circumstances if we are unable to contact your primary contact e.g. a parent.

- **Maintaining attendance registers and waiting lists**

For health and safety purposes and club records, we need to maintain a register of those in attendance at training or other club activities.

If there are no places in the club, we can place you on our waiting list and will contact you using the details you provide to inform you when a place is available.

- **Registering you as a member of Scottish Gymnastics**

As a Scottish Gymnastics registered club, all our members require membership with our governing body, of which insurance is a benefit. It also enables Scottish Gymnastics to safeguard the sport and allows members to access support and advice and participate in courses, competitions and events run by Scottish Gymnastics and its affiliated organisations.

- **Entering you into a competition and providing results**

If you wish to take part in a competition, your information (usually your name, date of birth and gender) will be used to enter you into the appropriate category and your score will be recorded. Results of club competitions are normally published [on our website].

- **Collecting additional information to support a participant attend a club trip**

Occasionally we organise residential events or trips. If you or your child registers for one of these events, we will need to collect additional information, that may vary dependent on the specific activities and whether they involve meals and travel. Additional information we require may include passport information and any other relevant information necessary to provide support whilst away from home.

- **Monitoring progress, performance and undertaking fitness assessments**

We track and monitor gymnast's progress and if they are a competitive gymnast, their performance in training, trials and competition and undertake regular assessments. We may require additional information about lifestyle and education or lifestyle.

# PRIVACY POLICY

- **To monitor that you have completed any required safeguarding training and criminal record checks**

If you undertake a role where a criminal record check and wellbeing and protection training are required, we will receive confirmation from Scottish Gymnastics if your check is approved and that you have completed the required wellbeing and protection training.

- **Filming for coaching purposes**

On occasion, we may film gymnasts e.g. during a gymnastics session for coaching purposes. Videos taken at training sessions for individual coaching purposes will not be used for any other purpose without prior consent.

- **Photography and filming [at large club events] to promote the club**

At our large club events such as our annual club competitions and club display, we take photos to promote club activities and may film the event to create video content. We publish images on our website, social media account and in our communications. Any images of children will be published in line with Scottish Gymnastics' safe sport policies on photography.

Let us know if you do not wish to be filmed or photographed or do not want your image to be published. While we can usually take steps to prevent you from being photographed or filmed at small club events, please bear in mind that at our large public events, it may be difficult to avoid capturing you in footage. However, we always review all photographs prior to publication, and we will ensure any images of you are deleted.

If we are filming or taking photos for any other purpose, we will ask for your consent.

- **Running and monitoring our club website and social media**

We do not use any tracking or analytics on our website. Your IP address will be logged by our webserver, but we would not be able to identify you from this information alone.

- **Using CCTV for security and crime detection/prevention**

CCTV images are only utilised for purposes of security and health and safety and will only be utilised by Acrobay Gymnastics Trust unless instructed by the relevant authorities.

We have carried out a legitimate interest assessment (LIA) to ensure that the above processing is necessary and is carried out in a way that ensures a balance between the club's interests and your individual interests, rights and freedoms with appropriate safeguards, especially to protect the interest of data subjects who are children. We can provide details of these assessments on request.

You have a right to object to the use of your information for any purposes we undertake based on legitimate interests. Further information is provided in the section below on individual rights.

# PRIVACY POLICY

## Consent

We rely on consent in the following circumstances:

- **to use your email or telephone numbers for marketing purposes**

We will send you our newsletter and other information about our activities, services and products that we think might be of interest to you. We will send you this information to by email, SMS or by a private messaging service.

- **to take photographs and video at a small club event or training for publication.**

With your consent, we may also take photos during training or at club events to promote the club on our website, club social media account and in communications. All film and photos of children will be published in line with our safeguarding policy.

- **to claim gift aid**

As a registered charity we are eligible to claim gift aid on any donations from donors who pay tax in the UK

You have the right to withdraw consent at any time, which you may do by contacting us using the contact details below.

## Special categories of personal data

Special categories of personal data are a category of information that is more sensitive and requires greater protection. Some of the information we process falls into this category (e.g. health/medical data or any information you provide to us about a disability or your religion, race or gender identity). It is unlawful for organisations to process this type of information unless an additional legal condition applies. We will only process this type of information if one of the following applies:

- You have given your explicit consent or have made this information public;
- We are required to do so to establish, exercise or defend a legal claim;
- We are required to do so to comply with employment or social security or social protection law;
- Legitimate activities of a 'not for profit' organisation;
- There is a substantial public interest in doing so; or
- It is in your vital interests and you are unable to provide consent e.g. if you are unconscious or do not have sufficient mental capacity; or
- There is a substantial public interest in doing so including:
  - Support for individuals with a particular disability or medical condition
  - Safeguarding of children and individuals at risk
  - Standards of behaviour in Sport
  - Anti-doping in Sport

# PRIVACY POLICY

## Why we share information about you

We share information about you with the following recipients (or categories of recipients) for the following reasons:

- Scottish Gymnastics/British Gymnastics – in addition to the sharing of personal data for membership purposes, or as necessary to enter you into a competition, course or event provided by Scottish Gymnastics/British Gymnastics, we will disclose information for safeguarding and other regulatory purposes including reporting of incidents in the club.
- Her Majesty's Revenue & Customs (HMRC), Health & Safety Executive (HSE), Police and Information Commissioner's Office (ICO) - where it is necessary to complying with legal and/or regulatory responsibilities

We may also share information with other organisations to safeguard children. Any information that is shared will be strictly limited to what is required to ensure children are protected from harm and will be carried out in accordance with the law and relevant government guidance.

- Our insurance providers for claims purposes
- Our legal and professional advisors where necessary to obtain advice.
- With social media providers to promote our activities
- Our service providers where it is necessary to provide the service e.g. our club membership system

All service providers are contractually required to ensure your information is secure and cannot use this information for their own purposes. Where we are required to share information with them to provide the service, we only disclose information that is necessary to deliver the service

## How long we keep your personal data

We will not keep your personal data for longer than we need it for the purpose for which it is used. Different retention periods apply for different types of personal data.

Video footage that has only been taken for coaching purposes will be retained only for as long as it is required for that purpose and in most cases, will be deleted within one month.

Photographs and other video footage captured for promotional purposes will be retained for up to 4 years old. After this time, they will be deleted unless we consider them to be of public interest and should consequently be archived for historical purposes. Where images have been published on social media, these platform providers may continue to process your data after the retention period has lapsed.

CCTV footage will be deleted within 7 days unless it is required to prevent or detect a crime.

Additional information that has been provided solely for the purpose of participating in a specific activity will be deleted after the event.

# PRIVACY POLICY

If you do not renew your membership or cease to have a relationship with the club, we will usually delete any information you provided within two years. We will retain any financial/accounting records for seven years. Some records, such as incident reports are retained for longer periods in line with claims limitation periods. Following the end of the of the relevant retention period, we will delete or anonymise your personal data.

## Transfers of data out of the UK

We will not transfer or store your personal data outside the UK. OR

We may transfer your personal data outside the UK for the follow purposes:

- To overseas competition organisers for competition entry reasons only

We will not transfer your personal data outside the UK unless it is necessary and the UK government has decided the applicable country ensures an adequate level of protection of personal data (known as an 'adequacy regulation') there are other appropriate safeguards in place, together with enforceable rights and effective legal remedies or a specific exception applies under UK data protection law.

## Individual rights

You have important rights under data protection law. In summary these include:

- **To be informed about how your information is processed** (set out above)
- **To access any personal data held about you**  
You have the right to access information we hold about you. You can also request a copy of your personal data by writing to us using the contact details below.
- **To have your data rectified if it is inaccurate**  
If you think that any of the information we hold is inaccurate, you can ask that corrections are made. We will either make the requested amendments or provide an explanation as to why we are not making changes
- **To have your data deleted (except if there is a valid lawful reason to retain it)**  
You have a right to request the deletion of your personal data. We will delete this information unless there is a lawful reason for the information to be retained.
- **To have your information restricted or blocked from processing**  
If you object to processing, we will restrict the processing of your information for the purpose to which you are objecting whilst we review your objection.
- **To portability**  
If you wish to move to another club, you can transfer your membership data to another club on the Scottish Gymnastics membership system.
- **To object to:**
  - **Any processing based on legitimate interests**  
The right to object is specific to the data subject's particular situation. We will stop processing your personal data unless we can demonstrate compelling legitimate grounds for the processing, which override your individual interests, rights and freedoms or we need to continue to process your information in connection with a legal claim.
  - **Your personal information being used for direct marketing activities**





# PRIVACY POLICY

[Learn more about your rights.](#)

To exercise any of your rights or if you have any questions about our privacy notice please contact:

Suzanne Fraser, Gym Manager  
Acrobay Gymnastics Trust  
Nervyn Cara House  
1 Primrose Lane  
Rosyth  
KY11 2SF

Tel: 01383 249951

Email: [Suzanne.fraser@acrobay.co.uk](mailto:Suzanne.fraser@acrobay.co.uk)

While we hope to be able to resolve any concerns you have about the way that we are processing your personal data, you have the right to lodge a complaint with the Information Commissioners Office (ICO) if you believe your data has been processed in a way that does not comply with the GDPR or have any wider concerns about our compliance with data protection law. You can do so by calling the ICO helpline on 0303 123 1113 or via their website.

## **Keeping your personal information secure**

We have appropriate security measures in place to prevent personal information from being accidentally lost or used or accessed in an unauthorised way. We limit access to your personal information to those who have a genuine reason to need to know it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality. We also have procedures in place to deal with any suspected data security breach. We will notify you and the ICO of any personal data breaches in line with our legal obligations.

We keep our privacy notices under regular review. This privacy notice was published on 14<sup>th</sup> August 2024 and last updated on 24<sup>th</sup> July 2024.

We may change this privacy notice from time to time, when we do, we will inform you via email.