



VOLUNTEER



# UEFA EURO 2020 GLASGOW

## THE SCOTTISH FA PRIVACY POLICY AND USE OF YOUR PERSONAL INFORMATION FOR VOLUNTEERS

### 1. INTRODUCTION

The Scottish Football Association (“Scottish FA” – our full details are provided below in section 2(b)) respects your privacy and is committed to protecting your personal data, being transparent about how it handles your personal information, ensuring the security of your personal information and to meeting its data protection obligations. This privacy policy (“Privacy Notice”) will inform you about how we look after your personal data, your privacy rights, and how the law protects it. The Scottish FA collects and processes personal information, or personal data, relating to its participants to manage our relationship. This personal information may be held by the Scottish FA on paper or in electronic format.

In this Privacy Notice, “Data Protection Legislation” means all applicable legislation which relates to the protection of individuals with regards processing personal data, including the Data Protection Act 2018, the General Data Protection Regulation (EU) 2016/679, and the Privacy and Electronic Communication Regulations 2003 (as amended).

This Privacy Notice applies to all prospective, current and former volunteers. It is non-contractual and does not form part of any existing agreements.

### 2. IMPORTANT INFORMATION AND WHO WE ARE

#### (a) Purpose of this Privacy Notice

The purpose of this Privacy Notice is to make you aware of how and why we will collect and use your personal information both during and after your relationship with the Scottish FA. We are required under Data Protection Legislation to notify you of the information contained in this Privacy Notice.

It is important that you read this Privacy Notice together with any other privacy policy or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data.



(b) **Controller**

**THE SCOTTISH FOOTBALL ASSOCIATION LIMITED** is the controller and responsible for your personal data; we have our registered office at Hampden Park, Glasgow G42 9AY and Company Number SC005453. We are responsible for deciding how we hold and use personal information about you.

Where this Privacy Notice talks about “the Scottish FA”, “we,” “our,” or “us” in this Privacy Notice, we are referring to The Scottish Football Association Limited. Please address any correspondence for the attention of the Data Protection Officer or e-mail [DPO@Scottishfa.co.uk](mailto:DPO@Scottishfa.co.uk).

We have notified the Information Commissioner’s Office that we are a data controller under registration number Z7099905.

We are required under Data Protection Legislation to notify you of the information contained in this Privacy Notice. Our contact details are set out at section 14 below.

(c) **Data protection principles**

Under the GDPR, there are six data protection principles that the Scottish FA must comply with. This says that the personal data we hold about you must be:

1. Processed lawfully, fairly and in a transparent manner.
2. Collected only for specific, explicit and legitimate purposes that have been clearly explained to you and not further processed in a way that is incompatible with those purposes.
3. Adequate, relevant and limited to what is necessary in relation to those purposes.
4. Accurate and, where necessary, kept up to date.
5. Kept in a form which permits your identification for no longer than is necessary for those purposes.
6. Processed in a way that ensures appropriate security of the data.

### 3. HOW WE COLLECT INFORMATION ABOUT YOU

We obtain your personal data in different ways:

- directly from you, for example when you fill out an application or other form;
- We may collect information about you from other sources, for example if we are required to carry out a credit reference check or other verification process as part of your application we may receive information about you from credit reference agencies, police forces and other relevant third parties;
- during the application and volunteer recruitment process;
- during your volunteering with us; and
- from monitoring emails, internet and telephone usage, access control systems and when we use CCTV systems.

### 4. TYPE OF INFORMATION WE COLLECT AND HOLD ABOUT YOU

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where your identity has been removed (anonymous data).

We will collect, store, and use the following categories of personal information about you:

**(a) Information in connection with volunteer application and volunteering**

- your name;
- e-mail address;
- postal address;
- telephone number;
- proof of your eligibility to work within the UK;
- Photo;
- Photograph identification document and number;
- Personal contact details such as full name, title, addresses, telephone numbers, and personal email addresses;
- Date of birth, gender, next of kin and emergency contact information;
- Start date and location of volunteering;
- Volunteering information (including copies of right to work documentation, references and other information included in a CV or cover letter or as part of the application process);
- Copy of driving licence (if required for the role);
- CCTV footage and other information obtained; and
- Photography, filming and recording of your volunteering.

**(b) Information relating to special categories**

We may collect special categories of personal data (often referred to as “sensitive personal data”) relating to you, in accordance with Data Protection Legislation, including:

- Information about your race or ethnicity, religious beliefs, sexual orientation and political opinions to monitor our diversity processes; and
- Information about your health, including any medical condition, health and sickness records to comply with our health and safety obligations.

**(c) Information on Criminal Convictions**

- We will only collect information about criminal convictions if it is appropriate given the nature of the role and where we are legally required to do so to comply with legal requirements and obligations to third parties. Where appropriate, we will collect information about criminal convictions in advance of, and at any time during, your volunteering with us.

## **5. HOW WE USE YOUR PERSONAL DATA**

The Scottish FA needs to keep and process information about you for the purposes of your volunteering. The information we hold and process will be used for our management, administration and statistical analysis. We will keep and use it to enable us to run the business and manage our relationship with you effectively, lawfully and appropriately during the volunteer selection process, whilst you are volunteering for us, at the time when your volunteer role ends and after you have left the organisation. We will only use your personal data when the law allows us to.

This includes using information to enable us:

- to manage our relationship with you effectively, lawfully and appropriately;
- to carry out shortlisting of volunteers and interviews;
- to comply with your volunteer registration;
- to comply with any legal and regulatory requirements;
- to pursue the legitimate interests of the Scottish FA and your interests and fundamental rights do not override those interests; and
- to protect our legal position in the event of legal proceedings.

If you do not provide us with the personal information when requested we may be unable in some circumstances to comply with our obligations and we will tell you about the implications of that decision.

## 6. OUR LEGAL GROUNDS FOR PROCESSING YOUR DATA

Under Data Protection Legislation we are required to have a legal ground to process your personal information. Our legal grounds for the processing of your personal information are one or more of the following:

- Your consent, where you have agreed to us using personal information;
- the processing is necessary for the performance of a contract of volunteering with us to which you are party or in order to take steps at your request prior to entering into a contract with us;
- the processing is necessary for compliance with a legal obligation to which we are subject; or
- the processing is necessary for the purposes of our legitimate interests or those of a third party, such as financial interests, operational and administrative interests, ensuring security, health and safety, maintaining our relationship with you.

Where we process special categories of personal data we require to have further justification under the Data Protection Legislation for the collection, storing and use of this type of personal information. We may process special categories of personal data in the following circumstances:

- where you have given your explicit written consent;
- where it is required in the public interest;
- where the processing is necessary for the protection of your vital interests, or someone else's interests; where you are not capable of giving your consent; or
- where you have already made this information public.

The Appendix attached to this Privacy Notice sets out in more detail the processing we will carry out, types of personal data required and the lawful ground(s) for such processing.

## 7. YOUR RIGHTS UNDER THE DATA PROTECTION LEGISLATION

Under Data Protection Legislation, you are entitled to exercise the following rights over your personal data:

- **Right to object**: You can object to our processing of your personal information if we rely on a legitimate interest ground to process your personal information.
- **Access to your personal information**: You can request access to a copy of your information that we hold, along with information on what personal information we use, why we use it, who we share it with, how long we keep it for and whether it has been used for any automated decision making. You can make a request for access free of charge.
- **Right to withdraw consent**: If you have given us your consent to use your information to send you marketing emails, you can withdraw your consent at any time or by clicking the "unsubscribe" link in any marketing email which you receive.
- **Rectification**: You can ask us to change or complete any inaccurate or incomplete personal information held about you.
- **Erasure**: You can ask us to delete your information where it is no longer necessary for us to use it, you have withdrawn consent, or where we have no lawful basis for keeping it.
- **Portability**: You can ask us to provide you or a third party with some of the personal information that we hold about you in a structured, commonly used, electronic form, so it can be easily transferred.
- **Restriction**: You can ask us to restrict the personal information we use about you where you have asked for it to be erased or where you have objected to our use of it. the right to ask us not to process your personal information for marketing purposes. We will usually inform you (at the time of collecting information) if we intend to use your information for such purposes or if we intend to disclose your information to any third party for such purposes. You can exercise your right to prevent such processing by checking certain boxes on the forms we use to collect your information or at any time by contacting us.

If you would like to exercise any of your rights above, please contact us by email to [dpo@scottishfa.co.uk](mailto:dpo@scottishfa.co.uk). We may need to request specific information from you in order to verify your identity and check your right to access the personal information or to exercise any of your other rights. This is a security measure to ensure that your personal information is not disclosed to any person who has no right to receive it.

If you believe that we have not complied with your data protection rights, you have the right to make a complaint to the Information Commissioner's Office (ICO) at any time. The ICO is the UK supervisory authority for data protection issues, at <https://ico.org.uk/>.

## 8. INTERNATIONAL TRANSFER

We will not transfer your personal information to countries outside the UK and the European Economic Area. If there is a requirement to transfer your personal data out of the UK and the EEA, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission. For further details, see “European Commission: Adequacy of the protection of personal data in non-EU countries”.
- Where we use certain service providers, we may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe. For further details, see “European Commission: Model contracts for the transfer of personal data to third countries”.
- Where we use providers based in the US, we may transfer data to them if they are part of the Privacy Shield which requires them to provide similar protection to personal data shared between the Europe and the US. For further details, see “European Commission: EU-US Privacy Shield”.

## 9. DATA RETENTION

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

In some circumstances we may anonymise your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you.

We may also hold your personal information for longer where it is necessary to do so for the management of any active or potential legal proceedings, to resolve or defend claims, and for the purpose of making any necessary remediation payments.

## 10. SECURITY

The Scottish FA has put in place measures to protect the security of your personal information. We have internal policies, procedures and controls in place to try and prevent your personal information from being



accidentally lost or destroyed, altered, disclosed, used or accessed in an unauthorised way. In addition, we limit access to your personal information to those employees, workers, agents, contractors and other third parties who have a business need to know in order to perform their job duties and responsibilities.

Where your personal information is shared with third party service providers, we require all third parties to take appropriate technical and organisational security measures to protect your personal information and to treat it subject to a duty of confidentiality and in accordance with Data Protection Legislation. We only allow them to process your personal information for specified purposes and in accordance with our written instructions and we do not allow them to use your personal information for their own purposes.

The Scottish FA also has in place procedures to deal with a suspected data security breach and we will notify the Information Commissioner's Office (or any other applicable supervisory authority or regulator) and you of a suspected breach where we are legally required to do so.

## 11. MARKETING

We will not send any direct marketing emails to you without your consent. We may, however, still be required to contact you and shall only send "service" emails where required for the purposes of providing important information about the events and such emails that are necessary for the purposes of fulfilling our contract with the participant, or where it is in our legitimate interests to send such "service" emails.

Where you consent to receive direct marketing emails from us, we use that information to tell you about the information you've asked us to tell you about. We don't share email lists with other organisations and businesses.

We use a third party provider, *MailChimp*, to deliver our newsletters and marketing emails. We gather statistics around email opening and clicks using industry standard technologies to help us monitor and improve our e-newsletter and marketing mails. For more information, please see [MailChimp's privacy notice](#).

You can unsubscribe to general mailings at any time by clicking the unsubscribe link at the bottom of any of our emails or by emailing our data protection officer at [dpo@scottishfa.co.uk](mailto:dpo@scottishfa.co.uk)

## 12. DISCLOSURE OF YOUR INFORMATION

The information you provide to us will be treated as confidential. However, we may disclose your information to other third parties where required by law, where it is necessary to administer our relationship with you or where we have another legitimate interest in doing so.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

We share your details with the following third parties:

- Police Scotland;
- Greater Manchester Police;
- UEFA (including its subsidiaries and third parties appointed by UEFA);
- MailChimp (if you consent to us sending you marketing emails);
- Affiliates of the Scottish FA; and
- Third Parties appointed by the Scottish FA to assist in the organisation of the UEFA EURO 2020 volunteer programme in Glasgow.

## 13. NOTIFICATION OF CHANGES

We keep this document under regular review. When revised, we will place an updated version on our intranet and our external website. Regularly reviewing these pages ensures you are always aware of what personal information we collect, how we use it and under what circumstances, if any, we will share it with other parties



## 14. CONTACT US

If you have any questions about this Privacy Notice, including any requests to exercise your legal rights or making a complaint to us about how we have used your personal data, please contact us by:

- Email at [dpo@scottishfa.co.uk](mailto:dpo@scottishfa.co.uk); or
- Writing to us at:  
Data Protection Officer  
The Scottish Football Association  
Hampden Park  
Glasgow  
G42 9AY

## APPENDIX TO PRIVACY NOTICE

	Purpose for Processing	Categories of Personal Data	Legal Basis
1.	For the administration of your Volunteering	Full name, date of birth, role title, residential address, email address, telephone number.	Will be treated as performance of a contract and in performance of our obligations and exercise of our rights as your volunteer administrator
2.	The volunteer recruitment and selection process	Full name, date of birth, residential address, email address, telephone number, CV, education, employment history and background checks.	Pursuance of our legitimate interests.
3.	Checking you are legally entitled to work in the UK	Full name, date of birth, passport number.	Compliance with legal obligations.
4.	Recording health and safety incidents	Full name, health information (as is relevant to the specific incident, such as injury sustained or any underlying health conditions).	Pursuance of our legitimate interests, in compliance with legal obligations, and as necessary to exercise our rights as your volunteer administrator.
5.	Conducts Issues, Volunteer disputes.	Full name, volunteer role details, performance information and information about the conduct matter	To exercise our rights as a volunteer organisation for fact finding for conduct meetings on the basis of legal obligation/contract/legitimate interest – in compliance with our policies and conduct process.
6.	Volunteer training and development	Full name.	To perform our obligations as a volunteer administrator to ensure volunteers are adequately trained, to comply with legal obligations (such as health and safety regulations and data protection) and sometimes in pursuance of our legitimate interests.
7.	Recording of CCTV footage	Photographs and images captured by our CCTV system.	As required for public safety and for public interests.
8.	Monitoring use of company devices and IT systems	Information contained in emails and stored on company devices	It is in our legitimate interests to ensure that devices issued by us are used appropriately; it is also necessary for our legitimate interests in ensuring information security.
9.	Vetting, including background checks, identity checks and driving licence checks (where you are eligible for driving a pool car etc.)	Full name, date of birth, residential address history (including current address), email address, telephone number, details of any criminal convictions and offences.	To comply with legal obligations and as necessary to exercise our rights as a volunteer administrator.

10.	Assessing our performance against equality objectives as set out by the Equality Act 2010	Information about your race or ethnicity, religious beliefs, sexual orientation, political opinions.	In pursuance of our legitimate interests and to comply with legal obligations to monitor and measure equal opportunities.
11.	Photography, filming and other recording whilst undertaking volunteer role.	Photographs, images and voice recordings.	Data subject consent in volunteer terms and conditions.



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WE CARE ABOUT FOOTBALL