
Sportscotland Glenmore Lodge Privacy Notice

Sport for life

sportscotland
the national agency for sport

Version 1.0 Final 24th Jan 2020

What is the purpose of this document?

sportscotland is committed to protecting the privacy and security of your personal information. This privacy notice describes how we collect and use personal information about you during and after you access our services, in accordance with the General Data Protection Regulation (GDPR). This Privacy Notice (together with any other privacy notice that we may provide to you) contains important information about how we collect, manage, use and protect your personal data.

This privacy notice is applicable to all visitors to our Glenmore Lodge National outdoor training centre.

The Scottish Sports Council, trading as 'sportscotland' of Doges, Templeton on the Green, 62 Templeton Street, Glasgow, G40 1DA is the "controller" of the personal information that you provide to us and is registered as a data controller with the Information Commissioner's Office. This means that we are responsible for deciding how we hold and use personal information about you. We are required under the GDPR to notify you of the information contained in this privacy notice.

We may change this Privacy Notice from time to time. Please check this policy frequently to ensure you are aware of the most recent version and the date that it was last updated.

Our contact details

Glenmore Lodge | Aviemore | Inverness-shire | PH22 1QZ

Tel: 01479 861 256

[Deaf/BSL users can contact us using the Contact Scotland service](#)

Email: enquiries@glenmorelodge.org.uk

Web: <http://www.glenmorelodge.org.uk/>

sportscotland Glenmore Lodge operates within **sportscotland** Trust Company which is a wholly owned subsidiary of The Scottish Sports Council, trading as '**sportscotland**'.

Registered address:

Headquarters

Doges | Templeton on the Green | 62 Templeton Street | Glasgow | G40 1DA

Tel: 0141 534 6595

Web: <https://.sportscotland.org.uk>

Data Protection Officer Contact Details:

Information Governance and Data Protection Officer

Doges | Templeton on the Green | 62 Templeton Street | Glasgow | G40 1DA

Tel: 0141 534 1176

Email: DPO@sportscotland.org.uk

What type of information we have

We collect and process the following information:

- Personal identifiers including your name, address, email address, phone number, date of birth, gender and age;
- Medical information, information relating to additional support needs and nutritional information;
- Photos and videos during events where such photos constitute personal data
- Correspondence with you via email or voicemail message;
- Financial and credit card information;
- Details of your visits to our website including, but not limited to, traffic data, location data, weblogs, other communication data and the resources that you access;
- CCTV Footage;
- Any information that you choose to send us via email or social networking tools such as Twitter, Facebook and Instagram;
- Name and email if you sign up for the company Newsletter; and
- Name, email and telephone number if you sign up to be a mock student for one of our courses.

How We Collate Information

We collect information provided by you directly by filling in forms on our website or when using our services.

- This includes information provided at the time of registering to use our site, subscribing to our service, subscribing to our newsletter, posting material or requesting further services;
- We may also ask you for information when you enter a competition or promotion sponsored by **sportscotland** and when you report a problem with our site;
- Medical information, information relating to additional support needs and nutritional information required for certain courses or accommodation booking is collected via our web booking or via telephone bookings and is required for certain courses or accommodation bookings;
- We capture photos and videos during events. Where such photos constitute personal data, we would only process these with your explicit consent;
- Correspondence received from you either via email or voicemail message;
- Financial and credit card information including details of transactions you carry out through our website are processed by us to fulfil your orders;
- Images of you may be captured by CCTV systems when you have attended some of our premises used by members of the public. These images are for the purposes of public and staff safety and crime prevention and detection. CCTV is also installed on the outside of some of our buildings for the purposes of monitoring building security and crime prevention and detection;
- Any information that you choose to send us via email or social networking tools such as Twitter, Facebook and Instagram; and
- Cookies: - A "cookie" is a text file that is downloaded to the hard drive of your computer and remembers your preferences and sessions. We use this information to (anonymously) track movements through our sites, to find out how it is being used and inform our improvements. This information is shared with Google Analytics and may be shared with third parties who perform similar services. This information is

fundamental to the provision of website services. Personal information about you is not collected during the tracking process. You can disable the cookies that we attach if your browser supports this. For further information on how to do this, please refer to www.allaboutcookies.org. However, you should bear in mind that if you exercise this option, you may be unable to use some of our on-line services.

We also receive personal information indirectly, from the following sources in the following scenarios:

- We may receive personal information about you indirectly if your details have been given to us as part of a group booking. The organisation coordinating the booking will pass your details to us.

Our Purposes for Processing Personal Data

We process the information you have given for the specific purposes.

- To allow you to participate in interactive features of our service, when you choose to do so;
- To notify you about changes to our service where we have consent to communicate with you via marketing;
- To book accommodation, book individuals onto training courses, and book individuals onto events;
- To process medical and accessibility information in relation to course provision when required for the safety of course attendees, or process and store in respect of our gym and climbing wall to allow safe provision of facilities;
- To pass nutritional information on to our catering providers in order for them to ensure dietary requirements are catered for. This includes third party away course accommodation providers;
- To process any accessibility information provided if relevant in order to ensure adequate facilities are provided for individuals;
- To provide you with information, products or services that you request from us or which we feel may interest you including marketing or to request customer feedback, **only where individuals provide consent for us to carry out this type of activity;**
- If you have given us consent to take photos/videos of you, we may share this on our websites, social media and **sportscotland** publications;
- If you have signed up to be a mock student on one of our courses; or
- If you have signed up to receive the newsletter.

We will not process your personal information for any other purpose.

Who we may share your information with

- We may share your information with the Emergency Services in the event of an injury or incident.
- If your personal information is included in any images or videos taken by us at our events, where that photo or video constitutes personal data and we have consent to use such personal data, we may share it on our websites for promotional/media purposes.

- **sportscotland** engages third-party suppliers to provide services including IT, payroll contractors for training, occupational health services or specific pieces of work, among others. These suppliers may process personal information on our behalf as “processors” and are subject to written contractual conditions to only process that personal information under our instructions and protect it.
- We may share personal information with our professional and legal advisors for the purposes of taking advice.
- We may also share your information with third parties from time to time if that sharing is required in relation to the service we are providing to you, including, but not limited to:
 - Third party software, analytics, website and search engine suppliers or IT suppliers including Google analytics, campaign monitor, Mailchimp, Crazy Egg, ESP, Strut Digital;
 - Service providers in relation to courses and bookings you make with us for events or courses provided by our affiliates including Scottish and National Governing Bodies. These include British Association of Ski Patrollers, Wilderness Medical Training, Scottish Canoe Association, British Cycling, Scottish Cycling, Mountain Training UKI, Mountain Training Scotland & Velotech. We will also share your name & any dietary requirements with accommodation providers for our ‘away’ courses where the accommodation provision part of the course is not at Glenmore Lodge; and
 - Finance and payment software including Worldpay and sagepay.

How we store and protect your information

Your electronic information is securely stored on Glenmore Lodge premises or on our **sportscotland** servers.

Where **sportscotland** retains your personal information in one of our own data centres, all data will be stored on UK based servers. Where **sportscotland** utilises cloud-based storage, your data may be stored in additional European Union country data centres for resilience, which are also governed by the General Data Protection Regulation. Core systems are only accessible by **sportscotland** staff and a small number of contracts for service practitioners.

Security measures in place within **sportscotland**’s data centres include -

Physical security measures include; Strong passwords; Password lock out policy; Managed permissions; Two factor authentication; Encryption; Antivirus software; Anti-malware software; Data loss prevention software; Secure Email Gateway; Software patch management and appropriate data backup arrangements.

Your personal information may also be stored on third party, cloud-based solutions. Where this is the case, **sportscotland** will ensure that that third party complies with the GDPR when processing your data. These systems include Mailchimp, our website provider, Strut, Sagepay payment gateway, survey monkey customer feedback.

Where your personal information is transferred out with the EU, we will provide you with information regarding the safeguards that we have put in place with the recipient country to protect your personal information.

Please be aware that data transmission received by service users over the internet is inherently insecure, and we cannot guarantee the security of data sent over the internet.

We retain all personal information in line with the **sportscotland** retention and destruction policy contained within the **sportscotland** Records management Plan which is

a legal requirement under the Public Records Scotland Act (2011) You can download this at: -<https://sportscotland.org.uk/freedom-of-information/foidocuments/records-management-plan/>.

Legal Basis for processing

We will only collect and process personal information where we have a legal basis for doing so under Data Protection legislation.

The legal basis's used by Glenmore Lodge national outdoor training centre for the processing of your personal information are: -

GDPR Article 6 (1)

- (a) the data subject has given consent to the processing of his or her personal data for one or more specific purposes;
- (b) processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract;
- (c) processing is necessary for compliance with a legal obligation to which the controller is subject; or
- (e) processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller.

In circumstances where you have given us consent to process your information, such as marketing or consenting to us using your images on our websites, you have the right to withdraw this consent at any time.

You can do this by emailing us at enquiries@glenmorelodge.org.uk or by contacting our Data Protection Officer via the contact details above.

Your data protection rights

Under data protection law, you have rights including:

Your right of access - You have the right to ask us for copies of your personal information.

Your right to rectification - You have the right to ask us to rectify information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.

Your right to erasure - You have the right to ask us to erase your personal information in certain circumstances.

Your right to restriction of processing - You have the right to ask us to restrict the processing of your information in certain circumstances.

Your right to object to processing - You have the right to object to the processing of your personal data in certain circumstances.

Your right to data portability - You have the right to ask that we transfer the information you gave us to another organisation, or to you, in certain circumstances.

You are not required to pay any charge for exercising your rights. If you make a request, we have one month to respond to you.

Please note the lawful basis used for processing your personal information can also affect which rights are available to you as there may be exemptions. Our Data Protection Officer will advise on any exemptions on request.

Please contact us at DPO@sportscotland.org.uk, 01415341176 sportscotland, Doges, Templeton on the Green, 62 Templeton Street, Glasgow, G40 1DA if you wish to make a request.

How to complain

If you have any queries or concerns regarding this Privacy Notice or how your personal information is processed, please contact the **sportscotland** Data Protection Officer in the first instance:

Information Governance and Data Protection Officer
sportscotland, Doges
Templeton on the Green
62 Templeton Street
Glasgow
G401DA
Email: DPO@sportscotland.org.uk
Tel: 01415341176

Please note you have the right to contact the Information Commissioner's Office if you are unhappy with how your enquiry has been dealt with. Their contact details are noted below:

Information Commissioner's Office – Scotland
45 Melville Street
Edinburgh EH3 7JL
Tel: 0303 123 1115
Email: Scotland@ico.org.uk