



PRIVACY NOTICE / POLICY

[Reviewed April 2022]

RSHGA Privacy Notice / Policy

The RSHGA is committed to protecting your personal information when you use our services, obtain our products or otherwise interact with us. This privacy notice was last updated on 4th April 2022.

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About us

The RSHGA is the sport governing body for Highland games, a company limited by guarantee, registered in Scotland No178568.

RSHGA is referred to in this privacy notice as "RSHGA", "we", "us" or "our".

What this notice applies to: This notice applies to personal information we collect about you when you interact with us (for example when you use our website WWW.RSHGA.ORG) or that we collect from third parties. It sets out:

Information you provide to us voluntarily

You may give us your personal information when you:

- register as an athlete competitor
- enrol/renew as a member
- order products and services from us;
- use our products and services;
- use, or provide a comment or write a review on, our websites;
- correspond with or contact us;
- enter into any of our competitions, promotions or surveys;
- contact us by telephone or email;
- interact with us on social media platforms;
- sign up to one of our newsletters or other communications;
- take part in our research;
- otherwise interact with us or provide information to a third party to be referred to us.

Where we request information from you we will collect the information set out in the relevant forms or pages, or as explained to you. You may choose to provide additional information to us when you contact us or otherwise interact with us or provide information to a third party to be referred to us.

Information we collect automatically

We, or the companies RSHGA work on our behalf, collect certain related data of visitors to our websites automatically including what pages you have viewed, for how long and your website journey.

Information is also collected about how you arrived at our websites in the first place, including what links or adverts of ours you have viewed or clicked on to reach us, or any search terms you have used. Where you see an advert outside of our website we, or an ad agency working on our behalf, will place a cookie on your browser so that, when you access our website, we recognise that you have seen an advert of ours elsewhere. Information collected automatically using cookies or other tracking technologies includes your IP address, and if you have logged in, your login details.

Information we collect from third-party sources

On occasions, we acquire information from another company, for example to supplement the data that RSHGA holds. For example, we use Google Analytics to collect information about how visitors to our website use the site, including collecting information on how long customers spend visiting our content items, how often they return to visit our websites and what demographic categories they fall into.

We collect, store and use the following types of information:

- your name and contact details (including your postal address, telephone number, email address(es), your membership number and social media identity);
- details about the products and services we provide to you;
- correspondence you have had with us;
- comments and reviews you have left on our websites;
- information about your computer / mobile device and your visits to and use of our websites, including for example your IP address;
- any other information shared with us as described in section 1 above.

The following sections describe in more detail how RSHGA, or one of the companies who work on our behalf, may use your information, and in particular the legal grounds on RSHGA we rely in doing so.

What we use your personal information for

We use the information collected for a number of purposes, including:

- to provide our products and services;
- to verify your registered athlete status and games membership status;
- to make and manage payments;
- to manage our relationship and communicate with you;
- to process insurance indemnity cover;
- to respond to complaints and seek to resolve them;
- to enhance your online experience;
- to conduct research and surveys;
- to develop and carry out marketing activities and competitions;
- to conduct clean sport education and undertake anti-doping testing;
- to understand your website journey, including what pages you have viewed and for how long;
- to communicate with regulators, legislators and corporate stakeholders;
- to administer and keep safe and secure our website and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
- to obey laws and regulations that apply to us.

The legal grounds we rely on to process your information

The legal grounds on which we rely are:

- to fulfil our contractual obligations (for example in order to provide the products or services requested and to contact you if a problem arises with them);
- to pursue our legitimate interests (for example to facilitate your use of our websites, including obtaining products or services via our websites, or for marketing);
- your consent; and / or
- to fulfil a legal duty.

Legitimate interests

When we rely on our legitimate interests, these are as follows:

- keeping our records up to date;
- charging for products and services;
- developing products and services;
- marketing our products and services, including through newsletters, email and social media;
- administering our websites and keeping them safe and secure;
- ensuring that content is presented in the most effective manner for you and your devices;
- processing insurance and clean sport work;
- measuring the use of our websites and improving their content and accessibility;
- measuring and understanding the effectiveness of advertising, and delivering relevant advertising to you;
- tailoring content and our communications so that they are most relevant to you;
- carrying out campaigns work and developing RSHGA policy;
- complying with legal and / or regulatory requirements;

- conducting disciplinary matters;
- advertising the details provided by our member games to the public for the purposes of increasing tourist and athlete visitors

We, or one of the companies who work on our behalf, share your personal information with the following third parties:

- **Data processors**

To help us fulfil contracts and to pursue our legitimate interests, we may share your personal information with third parties who provide services to RSHGA or who act on RSHGA's behalf, for instance insurance brokers, underwriters and UKSport's anti-doping team. We do not authorise these companies to use or disclose your personal information except for the purpose of providing the service we request of them. RSHGA and its data processing partners are based in the UK, but some third-party data processors may have subcontracted services based outside of the UK.

We use Paypal to process website-originated payments, and Sumup to process in-person card acquired transactions; more information on how Paypal & Sumup process your personal data and your data protection rights, including your right to object, is available in the privacy sections of their websites.

- **Social media companies, search engines and advertising platforms**

Personal information may be used to further our legitimate interests, in particular to better understand our target audiences on social media sites, search engines and advertising platforms (such as Google, Facebook, & YouTube). We may also use your personal data to promote our services on those platforms both to prospective new members of a similar profile, and to current existing members.

Occasionally a social networking widget may be found in some of our pages. This widget gives you the tool to bookmark our websites, blog, share, tweet and email our content to a friend. Your interaction with this tool, or being on the same webpage while being logged into these services, will result in further cookies from these social media companies being placed on your system.

- **Other third parties**

These third parties may be companies with which we have a relationship in relation to products and services provided to you, companies through which you have contacted RSHGA or companies you ask us to contact on your behalf.

Other circumstances in RSHGA we will disclose your information

We will disclose your information to regulators, governments, law enforcement authorities, advisors, courts, tribunals and arbitrators when we have a legal obligation to do so or when we believe our compliance with the request to be fair, reasonable and lawful, e.g. to detect, prevent or investigate security breaches, fraud or other crimes.

We will also disclose your information to establish, exercise or defend legal claims, for example: (i) to enforce our terms & conditions; (ii) to ensure the safety and security of our athletes, members and third parties; and (iii) to protect our rights and property and the rights and property of our website visitors, consumers and third parties.

Location of third parties

RSHGA does not currently exchange personal data with organisations located outside of the UK and the European Economic Area ("EEA"). If that position changes we will take appropriate steps to protect that information.

Information about your rights respecting personal data can be found at <https://ico.org.uk/for-the-public>.

Accuracy , Completion and Retention

We want to make sure that your personal information is accurate and up to date. Please always let us know if you think that it is not and needs updating.

Whenever we collect or process your personal data, we will only keep information about you for as long as we need to fulfil the purposes for which we are processing it. At the end of that retention period, your data will

either be deleted or anonymised. When determining how long we keep your data for, we adhere to the following principles in line with the UK GDPR:

- We review the type of information it is, the amount collected, how sensitive it might be and the reasons for storing it;
- We comply with any relevant legal requirements and industry standards or guidelines;
- We design our processes, products and services so that we don't hold your information any longer than we believe is necessary;
- Whenever we do keep your information, we apply appropriate safeguards to keep your data secure

We may use the information you provide to send you communications about RSHGA's products, services and news. This might be any available means for example email, post, telephone, SMS or instant message.

You can change your contact preferences (including unsubscribing from news/marketing communications) at any time by replying to the email/newsletter or by writing to us, emailing us or phoning us. All details can be found below .

If you are aged 13 or under, please get your parent's/guardian's permission before you provide information to us via our websites. Users without this consent are not allowed to provide us with information and, in the event that they do so, we will cease to process their information as soon as we find out.

You can contact us by post, telephone and email as follows:

Email:

secretary@rshga.org

Postal Address:

RSHGA Secretary, 54 Crawford Gardens, St Andrews, KY16 8XQ

Telephone number: 01334 476305