



TRIATHLON
SCOTLAND

Triathlon Scotland

Privacy Notice - Performance

October 2022

What we need

Based at Scotland's University for Sporting Excellence, The University of Stirling, Triathlon Scotland is the national governing body for triathlon (swim-bike-run), duathlon (run-bike-run) and aquathlon (swim-run), recognised by our Federation, British Triathlon.

Triathlon Scotland will be a "controller" of the personal information that you provide to us.

When you register as an athlete, we will ask you for the following personal information:

- personal details – name, DOB address, phone number, two emergency contacts (name, address, phone number, relationship);
- medical information – GP name and number, medical conditions, medications, allergies, tetanus status, any other relevant medical information;
- documents – passport, driving licence, EHIC; and
- misc. – photo, squad name, religious leader contact.

You will be asked to create a TrainingPeaks account and to share the following data:

- name, date of birth, personal coach, training activity including description, length of time and comments and a data file from any electronic training aid used.

We will collect the following testing data from you:

- general - name, training and race times, heart rate, data files and observations; and

- medical – injury exercises, blood reports and scans.

We will also ask you to share with us a dated Fit to Compete form completed by your GP or the Scottish Institute of Sport.

Why we need your personal information – contractual & legitimate purposes

We will use your personal information to:

- develop the appropriate opportunities on the Performance Programme for you;
- plan and facilitate training sessions, camps, competitions;
- contact your next of kin in emergency situations;
- contact you with information and opportunities with regards to you being an athlete on our programme;
- give you help and advice on your training and racing;
- inform you of when your next Fit to Compete form is required;
- promote and encourage participation in triathlon by sending communications and booking information for upcoming competitions and events. Our competitions and events may be filmed for live streaming purposes and your personal information may also be used in images captured from our competitions and events, which we use for promotional, education and development purposes;

- provide competition in triathlon by accepting and managing entries for our competitions and checking your personal information to ensure you are entered into the correct category;
- invite you to participate in surveys for research and development purposes;
- invite you as award winners or guests to our annual awards;
- respond to and communicate with you regarding your questions, comments, support needs or complaints, concerns or allegations in relation to triathlon. Further information with regards to this can be found in our [Complaints Policy](#) or [Disciplinary Rules for the Sport](#). We will use your personal information to investigate your complaint, to suspend membership and take disciplinary action.

If you do not provide us with all of the personal information that we need to collect then this may affect our ability to offer the above services and benefits.

Your rights

Where we process your personal information in pursuit of our legitimate interests, you have the right to object to us using your personal information for the above purposes. If you wish to object to any of the above processing, please contact us on admin@triathlonscotland.org. If we comply with your objection, this may affect our ability to undertake the tasks above for the benefit of you as an athlete.

Why we need your personal information – legal obligations

We are under a legal obligation to process certain personal information relating to our members, coaches, technical officials, volunteers, participants and athletes for the purposes of complying with our obligations under:

- the Companies Act 2006 to maintain a register of our members, which includes our members' name, address, the date they were admitted to membership and the date on which they ceased to be our member, and hold general meetings, including issuing notices and voting arrangements;
- the Protection of Vulnerable Groups (Scotland) Act 2007 to check that our coaches and volunteers are able to undertake regulated work with children and vulnerable adults;
- our sportscotland regulatory requirements to report on size, achievements and profile of our members, coaches, technical officials and athletes; and
- the Equality Act 2010, which requires us to process personal information to make reasonable adjustments where necessary.

Why we need your personal information – equality monitoring requirements

We are required to use our members, coaches, technical officials and volunteer's personal information relating to your disability (if any), ethnic group, religious belief, gender identity and sexual orientation for equality monitoring purposes as required by sportscotland.

We will process such personal information through aggregated and anonymised reports to identify and keep under review the existence or absence of equality of opportunity or treatment between groups of people within the same categories to promote or maintain equality within our sport.

Why we need your personal information – marketing

Where you are happy for us to do so, we would like to contact you via email with information about triathlon, our latest news and upcoming events, competitions and courses. Options for opting in to these communications can be found by logging into your account at www.britishtriathlon.org/my-account/login.

Once you submit your preference from our website, www.triathlonscotland.org/, to receive our newsletter, we will send you an email to confirm this. Please note we will not email you with any information

until you have confirmed your preferences by responding to our email.

You may change your preference at any time or request that we stop sending you email communications by contacting us at admin@triathlonscotland.org or logging into your account at www.britishtriathlon.org/my-account/login.

Triathlon Scotland uses Mailchimp as a third-party service provider. Mailchimp has signed up to "Privacy Shield" - an agreement between the US and EU Commission relating to the protection of personal data.

Other uses of your personal information

We may ask you if we can process your personal information for additional purposes. Where we do so, we will provide you with an additional privacy notice with information on how we will use your information for these additional purposes.

Who we share your personal information with

We work closely with British Triathlon and the Scottish Institute of Sport and will share personal information with them. We may also share your personal information with volunteer coaches. We will also share information with the University of Stirling staff directly supporting the delivery of the National Triathlon Centre. This

may be for facility access, scholarship awards, squad reviews and anything else directly related to your involvement in the National Training Centre.

If your personal information is included in any images or videos taken by us at our competitions and events, we may share this with sportscotland, Team Scotland, Commonwealth Games Scotland, and British Triathlon for promotional and/or journalistic purposes.

We may be required to share personal information with statutory or regulatory authorities and organisations to comply with statutory obligations. Such organisations include the Health & Safety Executive and Police Scotland for the purposes of safeguarding children.

We may also share personal information with our professional and legal advisors for the purposes of taking advice.

In the event that we do share personal information with external third parties, we will only share such personal information strictly required for the specific purposes and take reasonable steps to ensure that recipients shall only process the disclosed personal information in accordance with those purposes.

Athletes' / Participants' personal data

We publish the results of competitions on our website. This includes competitors' name, Triathlon Scotland membership number, age category and result.

We may also put your name, photo, club and information about you on our website.

We may also be required to share personal information relating to athletes' health in order to undertake activities to eliminate doping, at a sporting event, within our sport generally, or to provide information about doping, or suspected doping, to UK Anti-Doping or another body with responsibility for eliminating doping in our sport.

How we protect your personal information

Triathlon Scotland uses Dropbox, Google, Knack.com, Dartfish and the British Triathlon data management systems which are accessed by our staff and volunteers for the purposes set out above. Dropbox, Google and Knack.com have signed up to "Privacy Shield" - an agreement between the US and EU Commission relating to the protection of personal data. The European Commission has recognised Switzerland, where Dartfish is based, as providing adequate personal data protection.

We are required to transfer your personal information out with the EU for the purposes of entering

athletes into competitions, booking travel arrangements and accommodation for training camps. 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.

How long we keep your personal information

We will only keep your personal information for as long as necessary to provide you with athlete services. Unless you ask us not to, we will review and possibly delete your personal information where you have not been an athlete on our programme for six years.

We will keep certain personal information of members for longer in order to confirm your identity, when you took part in a session or race. We need to do this in the interests of child protection and to comply with the Companies Act 2006, which requires us to keep a register of members or in the event of a claim against Triathlon Scotland.

Your rights

You can exercise any of the following rights by writing to us at admin@triathlonscotland.org or by logging on to your account at www.britishtriathlon.org/my-account/login

Your rights in relation to your personal information are:

- you have a right to request access to the personal information that we hold

about you by making a
“subject access request”;

- if you believe that any of your personal information is inaccurate or incomplete, you have a right to request that we correct or complete your personal information;
- you have a right to request that we restrict the processing of your personal information for specific purposes; and
- if you wish us to delete your personal information, you may request that we do so.

Any requests received by Triathlon Scotland will be considered under applicable data protection legislation. If you remain dissatisfied, you have a right to raise a complaint with the Information Commissioner’s Office at www.ico.org.uk

