

Scarborough Athletic Club

Policy Document

Legitimate Interest Assessment

Background

Scarborough Athletic Club (SAC) indicates to members when they join that rather than specific consent being requested for use of their data, the club relies on the legitimate interest provisions as defined by GDPR. Essentially this means that the club uses data to meet the legitimate needs of such a club to provide the service that members sign up for and would expect. This is based on the assessment below. SAC is a registered charity.

Part 1 - The Data

SAC collects and processes personal data of its members to:

- provide required data to England Athletics so members are covered and protected by that membership
- keep members informed about the activities of the club so they can participate and enjoy their membership
- provide reports, statistics and records for races and other athletic events.
- meet its charitable objects of promoting athletics

Processing data to manage the membership and pass details to England Athletics (EA) is fundamental to the operation of the charity. Athletic Clubs are affiliated to England Athletics and all members of SAC are also members of EA. This allows members to compete, receive discounted entry and offers the club protection from a legal and insurance perspective. The club could not function without such protection.

The facility to opt out of the elements above is provided to members on request and the club believe that this provides the right balance for members in consideration of individuals' interests, rights and freedoms, and that it could not reasonably be achieved in an alternative way.

Part 2 - The Data Subjects

SAC considers that members would reasonably expect the club to collect and use the data in the way it does. It is considered that members will be aware of the impact of the processing of data held by SAC.

Processing of data as described by SAC is clearly in the interest of the members and adds to the value of the membership fee.

If the data was not processed as described there would be a clear detriment to the operation of the club.

As the club only collects the very basic information needed for the club to function efficiently and effectively, the same information is collected from minors who are members. Additional safeguards are put in place to ensure parental authorisation.

Part 3 - Obtaining the Data

The data is obtained directly from the members when they sign up. There is a clear privacy notice included in the sign up process which is managed by a third party that acts for numerous England Athletics affiliated clubs.

It is made clear that members can opt out of various uses of their data for whatever reason but the data has to be collected to enable us to provide EA with essential details and to administer the club.

The data held is minimal and is not considered to be obtrusive.

Where an individual has specific circumstances that require a different approach to the use of their data the club will make every effort to meet that individual's requirements.

Summary

Taking all the above into account SAC considers that following appropriate assessment agreed by its committee it is able to rely on 'legitimate interest' in relation to its collection and processing of data.