



**Wick Academy Football Club
Harmsworth Park Wick
EU General Data Protection Regulation
(GDPR) Privacy Policy
WAFC-P-011**



Version 1.7 – 4th July 2023

1. Introduction

At Wick Academy FC, we value your privacy, and want to make sure you're aware of your options to control your data. This Privacy Policy aims to increase transparency and compliance with the European Union's General Data Protection Regulation (GDPR) which came into effect on the 25th May 2018. We have included information in this Privacy Policy about the types of data that we collect, the ways in which we use the data, and the measures we take to keep your personal information safe and secure. Please make sure you read the Privacy Policy in full.

2. Who we are

Wick Academy FC is the data controller and we are responsible for your personal data (referred to as “Wick Academy FC”, “the club”, “we”, “us” or “our” in this Privacy Policy document).

Our full contact details are:

Wick Academy Football Club

Harmsworth Park

South Road*

Caithness

Scotland

KW1 5NH

Responsible Person for Data Protection: John Briskham

Email: WAFC_GDPR@wick-academy.co.uk

3. The Data We Collect

Please see Appendix A of this Privacy Policy for details of the information we collect, what we use it for and who (if anyone) we may share it with. A Data Protection Impact Assessment (DPIA) has also been carried out see Appendix B.

Please note that when using the using the Wick Academy FC web site (www.wick-academy.co.uk) we use cookies to track visitors. If you do not want this information to be stored on your computer, you may refuse to accept cookies at any time by activating the setting on your browser or device which allows you to refuse cookies. This will allow you also to prevent your browser from accepting new cookies as well as offering other options and settings concerning cookies including their deletion if required.

Our website may contain links to third- party sites. This Privacy Policy does not apply to those third-party sites. We recommend that you read the privacy statements of any

other sites that you visit as we cannot accept responsibility for the privacy practices of these sites, which may be different to ours.

4. Sharing and disclosing your data

We do not share or disclose any of your personal information without your consent, other than for the purposes specified in this Policy, or where there is a legal or governing body requirement to do so. Please see Appendix A of this document for further details on who (if anyone) we may share your data with.

5. Safeguarding Measures

Wick Academy FC takes your privacy seriously and takes every reasonable measure and precaution to protect and secure your personal data. We work hard to protect you and your information from unauthorised access, alteration, disclosure or destruction and always try to ensure that only the personnel or organisations (where appropriate) that require to see your information have access. Within the club data is only shared with staff that require access to it to carry out day-to-day business, e.g. paying staff wages or administering things like our Premier Club. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

6. How long we keep your data

Wick Academy FC only ever retains personal information for as long as is necessary to fulfil the purpose(s) for which it was collected. We are required under UK tax law to keep basic personal data for paid staff for a minimum of 6 years, after which time it will be destroyed. See Appendix A of this document for further information regarding retention periods for each category of data we hold.

7. Your rights regarding your data

You can request a copy of the data that we hold about you at any time by contacting us in writing or using this email address WAFC_GDPR@wick-academy.co.uk.

It is very important that the information we hold about you is accurate and up to date. Please let us know if at any time your personal information changes or you require us to destroy any of your data which we may hold.

Please note that you must provide proof of your identity when making any such requests for data information or amendments.

We will fulfil your request within one month of request receipt and will require a further two months for completion if your request is complex or numerous.

8. Complaints

If you are not happy with any aspect of how we collect and use your data, or respond to any enquiries, you have the right to complain to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues

(www.ico.org.uk). We would be grateful however if you would contact us first if you do have a complaint so that we can try to resolve it for you.

Document Control

Mandatory Review Date (To be reviewed and published annually).

Next Review Date: __4th July 2024__

Appendix A - Wick Academy FC – GDPR Data

| Category of Data | Description | Data Held | How we use your data | Shared with | Held\Stored | Retention |
|--|--|---|--|---|---|--|
| WEB Cookies | Cookies gathered when using the Wick Academy FC web site. | <ul style="list-style-type: none"> • IP address • Device Identifiers • Operating system • Browser type • Other technical details provided by users browser | Cookie technology is used to facilitate navigation of our web site. Cookies are small pieces of unique information, sent by a website, that are stored on your hard drive and temporarily in your computer's memory by your web browser. This allows the website to recognize you as you move through the website without your having to enter any personal information. | No-one. | Users hard drive and memory. | On web site browsing, retention governed by individual user. |
| Club Diversity and Inclusion Survey | A survey carried out every 2 years which is required as part of SFA club licensing. | <ul style="list-style-type: none"> • Generic anonymised questions relating to Diversity and Inclusion. The questions asked have been defined by the SFA • Sent every 2 years to Wick Academy staff, excluding players | No personal information is collected in the survey. The data gathered is shared with the SFA as requested under national club licensing section 8.19 – Diversity and inclusion. | SFA. | Google Forms – encrypted both in transit and at rest. | 2 years. |
| Miscellaneous E-forms | Various paper-based forms that have been converted into e-versions using Google forms. | <ul style="list-style-type: none"> • Persons name • Persons DOB • Persons e-mail address • Persons postal address • Details of their role at the club • Details of any spent or unspent convictions • Miscellaneous information regarding Child Protection | Mandatory requirement as part of SFA club licensing that have to be completed every year. The data collected is summarised in a template and shared with the SFA and Highland League as part of regular audits. | SFA. Scottish Highland Football League. | Google Forms – encrypted both in transit and at rest. | 2 years. |

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|-------------------------|---|---|--|-------|----------------------------------|----------|
| | | and annual self-declaration | | | | |
| Staff Details | Details on paid members of staff. | <ul style="list-style-type: none"> Name Address Bank Details NI Number Date of Birth Salary details | Paying staff employed by the club; Players, Manager and first team Assistant Managers. | HMRC. | WAFC Treasurer. | 6 years. |
| Player Contracts | Details on player contracts and registration forms. | <ul style="list-style-type: none"> Name Address DOB Email Address Contract dates Contract payments | Registering players with the SFA. | SFA. | SFA WEB site. WAFC Secretary. | 6 years. |

| Category of Data | Description | Data Held | How we use your data | Shared with | Held\Stored | Retention |
|-----------------------------------|---|--|--|-------------------------------|---|---|
| Management Staff Contracts | Contract details for Manager and Assistant Manager. | <ul style="list-style-type: none"> Name Address Contract start\end dates Contract Payments | Contract details for these staff stating their contract terms. | SFA. | WAFC Secretary. | 6 years. |
| Committee Details | List of all committee members. | <ul style="list-style-type: none"> Name Address Phone Number | Record of all committee members, used for club records and is needed for giving to SFA for official return, and SHFL for handbook. | SFA. SHFL. | SFA – Official return. SHFL – Club Handbook. | Whilst a committee member. |
| Member Details | List of Club Members. | <ul style="list-style-type: none"> Name Address | Recording list of club members. | No-one. | WAFC Secretary. | Whilst a valid member. |
| Premier Club Members | List of Premier Club Members. | <ul style="list-style-type: none"> Name Address | Recording list of Premier Club members used for weekly draws and sending prize winnings. | No-one | WAFC Premier Club Administrator. | Whilst a valid member. |
| PVG | Staff PVG details | <ul style="list-style-type: none"> Name Address Email Address | Register of all staff PVG checks used to ensure compliance. | Disclosure Scotland. CBRS. | WAFC Lead Signatory. | Whilst in role requiring PVG clearance with |

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|-----------------------------|--|--|--|---|--|-----------|
| | | <ul style="list-style-type: none"> • Phone number • PVG Scheme Number • Listing information • Details of any appropriate convictions • Dates of key courses | | Scottish Highland Football League. SFA. | | the club. |
| Player Consent Forms | Consent forms for U15 and U17 players. | <ul style="list-style-type: none"> • Name • Address • Phone Number • Email Address • Guardian details • Known Medical Conditions | Used to ensure consent is given by guardians and key contact information and any known medical conditions in case any issues arise at training or matches. | No-one | WAFC Secretary. Youth Coaches. Child Wellbeing Officer and Assistant Officer. WAFC Youth Team Admin staff. | Yearly. |

| Category of Data | Description | Data Held | How we use your data | Shared with | Held/Stored | Retention |
|-------------------------------|--|---|--|-------------|----------------------|-------------------------------------|
| Self-Declaration Forms | Self-Declaration form completed annually by all staff that are PVG scheme members. | <ul style="list-style-type: none"> • Title • Name • Address • Phone number • Email Address • Role • Relevant conviction details. | Used to ensure all convictions are declared, necessary for PVG compliance and annual SFA audits. | SFA. | WAFC Lead Signatory. | Yearly. |
| Sponsor Details | Details relating to club sponsors. | <ul style="list-style-type: none"> • Company Name. • Contact Name. • Address. | Used for contacting and billing sponsors for advertising boards, match hospitality etc. | No-one | WAFC Secretary. WAFC | Retained unless deletion requested. |

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|------------------------------|------------------------------------|--|--|--------|-----------------|--------------------|
| | | <ul style="list-style-type: none"> • Email Address. | | | Committee. | |
| Season Ticket Holders | List of all season ticket holders. | <ul style="list-style-type: none"> • Name • Concession or Full | As a master list of all people who purchase a season ticket, used to collate season ticket numbers and purchasers. | No-one | WAFC Secretary. | Yearly\Per season. |

Appendix B - Wick Academy FC – Data Protection Impact Assessment

Step 1: Identify the need for a DPIA

Explain broadly what project aims to achieve and what type of processing it involves. You may find it helpful to refer or link to other documents, such as a project proposal. Summarise why you identified the need for a DPIA.

As part of the day-to-day running of Wick Academy Football Club some personal data information needs to be held relating to the Club's staff and players. Some of the data held is of a personal nature, as identified in Appendix A above.

Step 2: Describe the processing

Describe the nature of the processing: how will you collect, use, store and delete data? What is the source of the data? Will you be sharing data with anyone? You might find it useful to refer to a flow diagram or other way of describing data flows. What types of processing identified as likely high risk are involved?

Some data is collected manually from the individuals and some is collected by using paper or electronic forms. All of the key data gathered has been listed in Appendix A of this document, along with the source, who it is shared with.

High risk data including Payroll/bank details is only shared by the Club Treasurer. Other lower level information such as names, addresses is stored securely only by nominated Club individuals on a "need to know" basis, and electronic data gathered using Google Forms is Encrypted both in transit and at Rest.

Describe the scope of the processing: what is the nature of the data, and does it include special category or criminal offence data? How much data will you be collecting and using? How often? How long will you keep it? How many individuals are affected? What geographical area does it cover?

The bulk of this is detailed in Appendix A of this document above. Data is held on approximately 50 players and staff and 100 supporters.

Describe the context of the processing: what is the nature of your relationship with the individuals? How much control will they have? Would they expect you to use their data in this way? Do they include children or other vulnerable groups? Are there prior concerns over this type of processing or security flaws? Is it novel in any way? What is the current state of technology in this area? Are there any current issues of public concern that you should factor in? Are you signed up to any approved code of conduct or certification scheme (once any have been approved)?

The individuals for who data is held will be either:

- Club committee members
- Club Players
- Club supporters

All individuals will have full control of the data shared with the Club, nothing is collected covertly.

All types and classifications of the data stored is listed in Appendix A above.

Describe the purposes of the processing: what do you want to achieve? What is the intended effect on individuals? What are the benefits of the processing – for you, and more broadly?

To enable the day-to-day running and administration of Wick Academy Football Club. The data held is required in order to process wages, communicate with staff and satisfy SFA requirements under National Club Licensing. Holding the data enables more efficient transaction processing and communication.

Step 3: Consultation process

Consider how to consult with relevant stakeholders: describe when and how you will seek individuals' views – or justify why it's not appropriate to do so. Who else do you need to involve within your organisation? Do you need to ask your processors to assist? Do you plan to consult information security experts, or any other experts?

Individuals are informed at the point any data is collected what the purpose of it will be and how it shall be used by Wick Academy Football Club.

Step 4: Assess necessity and proportionality

Describe compliance and proportionality measures, in particular: what is your lawful basis for processing? Does the processing actually achieve your purpose? Is there another way to achieve the same outcome? How will you prevent function creep? How will you ensure data quality and data minimisation? What information will you give individuals? How will you help to support their rights? What measures do you take to ensure processors comply? How do you safeguard any international transfers?

Measures and data held is deemed to be proportional to requirements. For example players wages cannot be paid unless their bank details are held by the Club treasurer. The data is only ever used for the purpose it is held for.

Step 5: Identify and assess risks

| Describe source of risk and nature of potential impact on individuals. Include associated compliance and corporate risks as necessary. | Likelihood of harm | Severity of harm | Overall risk |
|---|---------------------------|-------------------------|---------------------|
| Data breach of payroll information. Bank details used unlawfully. In over 20 years of playing players wages electronically such a breach has never occurred. Banks also have their own safeguards in place to minimize impact of this type of risk. | Remote | Minimal | Medium |
| Breach of information relating to players contracts or other personal information. Again deemed low risk as copies of all contracts are handled securely and only shared with the SFA on their external web systems. | Remote | Minimal | Low |
| Breach of staff names and addresses. Risk of identity theft but these details can be found using other means. All data held by the club is secured. | Remote | Minimal | Low |
| Breach of information relating to Disclosure Scotland information regarding PVG checks. Again risk is identity theft but all data is held securely and only shared with Disclosure Scotland and the SFA. | Possible | Significant | Low |
| Breach of data held in paper or e-forms. Again risk is identity theft but all data is held securely and only shared on a "needs to know basis". E-form data is stored in Google forms and is encrypted in transit and at rest. Google are ISO27001 and have security measures in place to safeguard the data stored in their systems. | Possible | Minimal | Low |

Step 6: Identify measures to reduce risk

Identify additional measures you could take to reduce or eliminate risks identified as medium or high risk in step 5

| Risk | Options to reduce or eliminate risk | Effect on risk | Residual risk | Measure approved |
|---|---|-----------------------|----------------------|-------------------------|
| Data breach of payroll information. Bank details used unlawfully. | Data shared on "need to know basis", bank safeguards protect unlawful use of data | Accepted | Medium | Yes |

Step 7: Sign off and record outcomes

| Item | Name/position/date | Notes |
|--------------------------------------|---|---|
| Measures approved by: | John Briskham – GDPR Manager – 20/10/22 | None to note |
| Residual risks approved by: | John Briskham – GDPR Manager – 20/10/22 | None to note |
| DPO advice provided: | No-one | None to note |
| Summary of DPO advice: N/A | | |
| DPO advice accepted or overruled by: | N/A | If overruled, you must explain your reasons |
| Comments: N/A | | |
| Consultation responses reviewed by: | N/A | If your decision departs from individuals' views, you must explain your reasons |
| Comments: | | |
| This DPIA will kept under review by: | John Briskham – GDPR Manager | None to note |