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Scottish Aikido Federation

Data Protection & Privacy Policy

In accordance with the UK General Data Protection Regulation (UK GDPR)

Policy Reference	SAF-GDPR-001
Version	1.0
Effective Date	May 2025
Review Date	May 2026
Approved By	SAF Committee
Data Controller	Scottish Aikido Federation
Applicable Law	UK GDPR & Data Protection Act 2018

1. Introduction

The Scottish Aikido Federation (SAF) is committed to protecting and respecting the privacy of all individuals whose personal data we process. This policy sets out how we collect, use, store, and protect personal data in accordance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

As a member organisation promoting Aikido throughout Scotland, we recognise that the lawful, fair, and transparent handling of personal data is fundamental to maintaining the trust of our members, instructors and students.

This policy applies to all personal data processed by the SAF, including data held about current and former members, affiliated clubs, volunteers, employees, and any individuals who interact with our services.

2. Who We Are — Data Controller Details

Organisation	Scottish Aikido Federation
Registered in	Scotland
Website	www.scottish-aikido.co.uk
Email	Chairman@scottish-aikido.co.uk
Role	Data Controller

If you have any questions or concerns about how your personal data is handled, please contact us using the details above.

3. Personal Data We Collect

3.1 Member and Student Data

We collect the following categories of personal data from members, students, and club affiliates:

- Full name, date of birth, and gender.
- Contact details: postal address, email address, and telephone number.
- Membership grade and grading history.
- Club affiliation and instructor information.
- Emergency contact details.
- Details of relevant medical conditions or disabilities (where provided voluntarily for safety purposes).
- Payment and subscription records.
- Competition or event participation records.

3.2 Sensitive (Special Category) Data

In limited circumstances, we may collect special category data, including:

- Health information — to ensure appropriate adjustments are made for training and events.
- Criminal conviction data — where required for safeguarding purposes (e.g., coaches working with children).

Such data is processed only with explicit consent or under applicable legal obligations and is subject to enhanced security measures.

3.3 Website and Digital Data

- IP addresses and browser information (via cookies).
- Enquiry and correspondence data submitted via online forms.
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4. Legal Basis for Processing

We process personal data only where we have a valid legal basis to do so under UK GDPR Article 6. The legal bases we rely on include:

Legal Basis	When It Applies
Contract	Processing membership registrations, grading records, and event bookings
Consent	Sending newsletters, marketing communications, and optional health disclosures
Legal Obligation	DBS/PVG checks for coaches working with children or vulnerable adults; financial record-keeping
Legitimate Interests	Maintaining accurate membership records, managing club affiliations, promoting the sport, and ensuring federation safety

5. How We Use Your Personal Data

We use personal data for the following purposes:

- Administering and managing SAF membership registrations and renewals.
- Recording and certifying Aikido grades and qualifications.
- Organising training events, seminars and gradings.
- Communicating with members about federation news, events, and policy updates.
- Processing payments and maintaining financial records.
- Ensuring safeguarding obligations are met for juniors and vulnerable adults.
- Meeting our legal and regulatory obligations under Scottish and UK law.
- Responding to member queries and complaints.
- Statistical analysis to improve our services (using anonymised data where possible).

6. Sharing Your Personal Data

The SAF does not sell, rent, or trade personal data. We may share data in the following limited circumstances:

- Joint Aikido Council — for affiliation, national grading, and insurance purposes
- Insurance providers — to arrange and maintain public liability and personal accident cover
- Government and regulatory bodies — where required by law (e.g., Police Scotland, OSCR)
- PVG/DBS scheme administrators — to process safeguarding checks for coaches and officials

Any third parties with whom data is shared are required to handle it in accordance with UK GDPR and will only use it for the specified purpose.

7. International Data Transfers

As a Scottish organisation, most of our data processing takes place within the UK and European Economic Area (EEA). In the limited circumstances where personal data is transferred outside the UK/EEA (for example, when using international software platforms), we ensure adequate safeguards are in place, including UK-approved Standard Contractual Clauses or equivalent mechanisms.

We retain personal data only for as long as necessary for the purposes for which it was collected, or as required by law. Our standard retention periods are:

Data Type	Retention Period
Active membership records	Duration of membership + 6 years
Grading and qualification records	Indefinitely (historical record)
Financial/accounting records	7 years (HMRC requirement)
Safeguarding / incident records	As directed by legal / regulatory guidance
Marketing consent records	Until consent is withdrawn + 1 year

8. Your Rights Under UK GDPR

As a data subject, you have the following rights in relation to your personal data:

- Right of Access — You may request a copy of the personal data we hold about you (Subject Access Request).
- Right to Rectification — You may ask us to correct inaccurate or incomplete personal data.

- **Right to Erasure** — You may request that your personal data be deleted, subject to our legal obligations.
- **Right to Restrict Processing** — You may ask us to limit how we use your data in certain circumstances.
- **Right to Data Portability** — You may request your data in a commonly used, machine-readable format.
- **Right to Object** — You may object to processing based on legitimate interests or for direct marketing.
- **Right to Withdraw Consent** — Where processing is based on consent, you may withdraw it at any time.
- **Rights relating to Automated Decision-Making** — We do not carry out solely automated decision-making that produces legal or similarly significant effects.

To exercise any of these rights, please contact us in writing at the address provided in Section 2. We will respond within one calendar month. There is no charge for a Subject Access Request unless the request is manifestly unfounded or excessive.

9. Data Security

The SAF takes appropriate technical and organisational measures to protect personal data against unauthorised access, disclosure, alteration, or destruction. Our measures include:

- Password-protected and encrypted digital storage systems.
- Restricted access to personal data on a need-to-know basis.
- Secure disposal of paper records containing personal information.
- Regular review of security practices and staff awareness.
- Incident response procedures in the event of a data breach.

In the event of a data breach that is likely to result in a risk to individuals' rights and freedoms, we will notify the Information Commissioner's Office (ICO) within 72 hours, and affected individuals without undue delay where required.

10. Cookies and Website Data

Our website may use cookies to improve user experience. By continuing to use our website, you consent to the use of cookies in accordance with this policy. We use:

- Essential cookies — required for the website to function correctly.
- Analytics cookies — to understand how visitors use our site (Google Analytics or similar).

You may disable cookies through your browser settings; however, this may affect your experience of our website.

11. Children and Young People

Where we process personal data relating to individuals under the age of 18, we take particular care in accordance with our Safeguarding Policy. For members under 16, we require parental or guardian consent before collecting personal data.

The SAF is committed to upholding child protection principles as set out by Safeguarding Scotland guidance.

12. Changes to This Policy

This policy will be reviewed at least annually and updated as required to reflect changes in law, guidance etc. The current version will always be available to members on request.

Where changes are material, members will be notified by email.

13. Complaints

If you have concerns about how the SAF handles your personal data and we have not resolved them to your satisfaction, you have the right to lodge a complaint with the Information Commissioner's Office (ICO):

ICO Website	www.ico.org.uk
ICO Helpline	0303 123 1113
ICO Address	Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

Approved by: SAF Committee

Date: May 2025