

Key Policy Document Title	Data Protection Policy
Adopted	28 October 2025
Updated	

Purpose

1. The purpose of this Data Protection Policy is to establish the way in which JudoScotland (JS) collects, processes, stores and protects personal data.
2. This Policy outlines JS commitment to meeting our requirements to protect personal data under the Data Protection Act 2018 (DPA) which implements the EU's General Data Protection Regulation (GDPR).

Additional Information

3. JS is registered as a Data Processor with the Information Commissioners Office (ICO).
4. Personal data refers to any information relating to an identified or identifiable individual.

Data Protection Principles

5. JS is committed to ensuring that all personal data it holds will be:
 - (a) Processed lawfully, fairly and in a transparent manner
 - (b) Collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes (purpose limitation)
 - (c) Adequate, relevant and limited to what is necessary (data minimisation)
 - (d) Accurate and kept up to date (data accuracy)
 - (e) Kept in a form which permits identification of data subjects for no longer than is necessary (storage limitation)
 - (f) Processed in a manner that ensures appropriate security of the personal data, including protection against accidental or unauthorised access to, or destruction, loss, use, modification, or disclosure of personal data (integrity and confidentiality).

Lawful, Fair and Transparent

6. To ensure processing of data is lawful, fair and transparent, JS shall keep and maintain Data Audits to record where and why we process personal data. This will be kept up to date and reviewed along with the Member Privacy Notice and Employee Privacy Notice on a regular basis.
7. The Data Audit will record our lawful bases (our reason) for processing any personal data, this must be one of the following as required by legislation:-
 - (a) Consent
 - (b) Contract
 - (c) Legal obligation
 - (d) Vital interests
 - (e) Public task
 - (f) legitimate interests



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8. The way in which we process personal data is detailed within our Privacy Notice which is available on the JS website (<https://www.judoscotland.com/wp-content/uploads/2022/06/Final-Privacy-Notice-Booklet-30Apr18.pdf>)
9. JS is fully committed to meeting the data protection principle of lawfulness, fairness and transparency.

Purpose Limitation

10. JS will be clear about what our purposes for processing data are and will record these purposes in our Data Audits and Privacy Notices.
11. JS will not use the personal data for any other purpose unless this is compatible with our original purpose, we get consent or we have a clear obligation or function set out in law.

Data Minimisation

12. JS will ensure that the personal data being processed is:
 - (a) Adequate – sufficient to properly fulfil our stated purpose
 - (b) Relevant – has a rational link to that purpose, and
 - (c) Limited to what is necessary – we do not hold more than we need for that purpose.

Data Accuracy

13. JS will take all reasonable steps to ensure that the personal data we hold is not incorrect or misleading as to any matter of fact.
14. JS may need to keep the personal data updated, although this will depend on what we are using it for.
15. If we discover that personal data is incorrect or misleading, we will take all reasonable steps to correct or erase it as soon as possible.

Storage Limitation

16. JS will not keep personal data for longer than necessary.
17. How long we keep personal data will depend on our purposes for holding the data. Retention of how long we keep personal data for, how it will be erased, anonymised or removed is contained within our Privacy Notice.
18. JS may need to keep personal data for longer for public interest archiving, scientific or historical research or for statistical purposes.

Integrity and Confidentiality

19. JS takes the security of personal data extremely seriously. We do this in a variety of technical and organisational security measures, including but not limited to:
 - (a) Regular data protection and cyber security training
 - (b) Acceptable Use of IT Policy is regularly reviewed to include protocol for passwords, two factor authentication, encryption etc.
 - (c) An identified staff member to provide advice and support on all aspects of Data Protection.
20. JS regularly updates and reviews current practices and seeks external advice, where appropriate.



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Rights of Individuals

21. Individuals have the right to access their personal data and any such requests made to JS shall be dealt with in line with legal requirements, with some limited exceptions.
22. UK GDPR provides the following rights for individuals in relation to their personal data:
 - (a) The right to be informed – JS do this by making sure our privacy notices are correct and up to date and direct individuals to these notices on our website (<https://www.judoscotland.com/company-documents/>)
 - (b) The right to access their own data – any subject access requests must be notified to the Head of Operations who will co-ordinate a full search of all our systems before responding to the individual within 30 days, as required by law
 - (c) Rectification – JS will quickly update any personal data which has been identified as inaccurate or incorrect
 - (d) Erasure – JS will remove any personal data if an individual requests this, unless we have another lawful basis which would prevent this e.g. we cannot delete employee records as we need to keep these to comply with other legislation
 - (e) To restrict processing – where there is a dispute about the accuracy, validity or legality of personal data held by JS, an individual has the right to require us to cease processing the data for a reasonable period of time to allow the dispute to be resolved
 - (f) The right to data portability – JS will provide an individual with their data in a common and machine-readable electronic format
 - (g) The right to object – complaints or objections to processing personal data will be dealt with quickly and accurately
 - (h) Rights in relation to automated decision making and profiling – JS do not carry out any automated decision making or profiling of any individual

Data Breach

23. A personal data breach means a breach of security leading to the accidental or unlawful destruction, loss, alteration, authorised disclosure of, or access to, personal data.
24. JS staff must be able to identify a suspected personal data breach, which could include the following:
 - (a) Access by an unauthorised third party to personal data
 - (b) Deliberate or accidental action (or inaction)
 - (c) Sending personal data to an incorrect recipient
 - (d) JS laptops/mobiles containing personal data being lost or stolen
 - (e) Alteration of personal data without permission
 - (f) Leaving paperwork on public transport
 - (g) Loss of availability of personal data.
25. If a JS staff member discovers or suspects a personal data breach, this should be reported to Head of Operations at the earliest opportunity.



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26. If there is a likely risk to an individual's rights and freedoms, the Head of Operations will report the personal data breach to the ICO within 72 hours of JS being made aware of the breach. JS will also notify those individuals without delay.
27. JS will keep a record of all personal data breaches reported and will follow up with appropriate measures and improvements to reduce the risk of reoccurrence.

Privacy by Design

28. Privacy by design is an approach that promotes privacy and data protection compliance from the beginning.
29. Where relevant, and when it does not have a negative impact on an individual, privacy settings will be set to the most private by default.

Risk Management

30. JS will ensure the appropriate staff training is provided and regularly reviewed to ensure all staff are compliant with this Policy.



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