



Privacy & Data Protection Policy

S.E.A. Dragons Esports

Document reference: SEA-POL-03

Document title: Privacy & Data Protection Policy

Version: 4.0

Last revision date: 16 June 2026

Responsible organisation: Scout Edge Analytics Ltd | Contact: patrykb@sea-dragons.com

Approval status: Approved

1. Purpose and responsibility

S.E.A. Dragons is a competitive esports club owned and operated by Scout Edge Analytics Ltd, which is also the Club's title sponsor. Scout Edge Analytics Ltd is the organisation responsible for deciding how the Club uses personal information (the data controller). This document explains what information we use and sets out the basic rules for handling it.

This policy applies to players, applicants, parents or guardians, staff, coaches, volunteers and anyone else whose information the Club holds. It also applies to staff and representatives handling that information on the Club's behalf. The Club aims to comply with the UK GDPR, the Data Protection Act 2018 and other applicable data protection requirements.

Data protection contact: patrykb@sea-dragons.com. **Controller:** Scout Edge Analytics Ltd. **Club correspondence address:** 29 Pendre Gardens, Brecon, Powys, LD3 9EP.

2. What information we collect

Depending on a person's involvement, the Club may hold names, ages, contact details, gaming usernames, Discord IDs, team and tournament history, competitive statistics, applications, contracts, payment and financial records, and parent or guardian contact details.

We may also hold photographs, video footage, social media material, communications relevant to club activity, and limited disciplinary, safeguarding or welfare records where necessary. We seek only the information needed for a clear purpose. We do not ask members to provide unnecessary personal details. Information usually comes from the individual, their parent or guardian, or their authorised representative. We may also receive relevant competition results or eligibility information from tournament organisers and other appropriate sources.



3. Why we use it and our lawful bases

We use personal information to consider applications, manage membership and rosters, arrange training and competitions, communicate with members and parents, meet contractual and financial responsibilities, protect participants, deal with complaints and maintain appropriate records.

Contract: where information is necessary to enter into or perform an agreement with a player, staff member or other individual. **Legal obligation:** where records or disclosures are required by law, including relevant financial and regulatory duties. **Legitimate interests:** where necessary for reasonable club administration, selection, performance management, security, complaints handling and maintaining a safe and effective organisation, after considering individuals' rights.

Consent: where consent is the appropriate basis for a particular optional use, such as certain publicity or promotional material.

We assess the appropriate basis for each purpose rather than treating consent as a blanket permission. Where safeguarding or welfare information includes sensitive personal data, the Club must also identify and document an appropriate additional legal condition before using it. Parental permission for a child to participate is separate from the lawful basis for processing personal data.

4. Photographs, publicity and competitive records

Player names, gaming handles, roster details, results and approved photographs or video may be published on the Club's website and social media, or supplied to tournament organisers, where there is a lawful basis and the publication is appropriate. We take particular care with material involving children and will seek the necessary permissions and apply safeguarding rules.

We do not routinely provide member lists or private contact information to sponsors or other third parties for their own marketing. Members should raise any concern about published personal information with the Club promptly.

5. Storage, access and sharing

Club records are primarily held in Google Drive or Google Workspace and club email accounts. Discord is used for routine communication, such as relaying tournament contact details and practical arrangements; the Club does not use it to store sensitive or important records. Access to personal information is limited to relevant staff and coaches who need it for their role. Financial, disciplinary and safeguarding records must not be stored in Discord. Information may be shared with tournament organisers or esports governing bodies where needed for registration, eligibility and competition administration; with service providers supporting our email, storage or communications; or with appropriate authorities where required or justified by law or safeguarding duties. Public-facing material is shared through the Club's website and social media.

Google, Discord and other service providers may process information outside the UK. The Club will review their data-processing arrangements and any safeguards required for international transfers, and will provide further information on request.



6. Retention and security

We keep personal information only for as long as it is reasonably needed. Routine player, roster and contact records are normally reviewed when someone leaves and deleted within approximately two years where there is no continuing reason to retain them. Financial, contractual, safeguarding or dispute-related records may need to be kept longer where justified by law or the circumstances. Records are reviewed and securely deleted when no longer required.

Authorised staff must use strong passwords and available multi-factor authentication, restrict sharing permissions, protect devices and report lost information or suspected unauthorised access promptly. Personal data must not be downloaded, copied, forwarded or discussed outside authorised club activity without a valid reason.

Safeguarding and welfare records require particular confidentiality. Heather Greer, Head of Safeguarding & Player Welfare, reviews significant safeguarding-related handling, access and retention decisions as appropriate. Such records are restricted to those who genuinely need them and are not subject to the routine two-year deletion approach where a longer period is justified. Sensitive correspondence may be sent privately to heatherg@sea-dragons.com.

7. Data breaches and requests from individuals

Anyone who becomes aware of a lost device, misdirected email, exposed file, unauthorised access or other possible personal data breach must report it promptly to patrykb@sea-dragons.com. The Club will contain and assess the incident, record what happened and decide whether the Information Commissioner's Office (ICO) or affected individuals must be notified. Notifiable UK GDPR breaches must normally be reported to the ICO within 72 hours of awareness, where feasible.

Individuals may ask for access to their personal information or request correction, deletion, restriction, portability or object to certain uses, as applicable. Where processing relies on consent, that consent can be withdrawn. Rights are subject to legal limits, including the need to retain some safeguarding or financial records. Requests can be sent to patrykb@sea-dragons.com and will be handled within applicable statutory timescales.

Individuals may complain to the ICO at ico.org.uk. The Club welcomes the opportunity to address a concern directly first, but this does not limit anyone's right to contact the ICO.

8. Responsibility, interpretation and review

Patryk Białowąs, General Manager, oversees day-to-day data protection arrangements and may seek input from the senior leadership team. Coaches and staff must handle information only for authorised purposes and raise concerns promptly. Access to information does not follow automatically from a person's role, ownership interest or involvement in a particular roster.

This policy should be applied in both its wording and its spirit. Reasonable judgement is permitted in ordinary administration, but cannot override legal obligations, confidentiality requirements or safeguarding protections. The Club will review this document when its practices or the law change and will provide updated privacy information when necessary.