



PRIVACY NOTICE

For Club Members

April 2018

WHAT IS THE PURPOSE OF THIS DOCUMENT?

Muthill Golf Club is committed to protecting the privacy and security of your personal information. This privacy notice describes how we collect and use personal information about you during and after your membership with us, in accordance with data protection law.

It applies to all members. The Club is a "data controller". This means that we are responsible for deciding how we hold and use personal information about you. We are required under data protection legislation to notify you of the information contained in this privacy notice.

It is important that you read this notice, so that you are aware of how and why we are using your personal information and of your rights in relation to your data.

HOW WE LOOK AFTER YOUR PERSONAL DATA

We comply with data protection law. This says that the personal information we hold about you must be:

- Used lawfully, fairly and in a transparent way.
- Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
- Relevant to the purposes we have told you about and limited only to those purposes.
- Accurate and kept up to date.
- Kept only as long as necessary for the purposes we have told you about.
- Kept securely

THE KIND OF INFORMATION WE HOLD ABOUT YOU

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We will collect, store, and use the following categories of personal information about you:

- Personal contact details such as name, title, addresses, telephone numbers, and personal email addresses.
- Date of birth.
- Gender.
- Membership criteria e.g. full, country, junior, winter.
- Bank account details.
- Joining date.
- Photographs (with explicit consent).

- PVG checks for club volunteers
- Mandatory training records for club volunteers.

HOW YOUR PERSONAL INFORMATION IS COLLECTED

We collect personal information about members through the application, or volunteering, process. We also record performance data such as competition scores, and outcomes of knock-out competitions

WHAT WE WILL DO WITH YOUR PERSONAL DATA

We will only use your personal information when the law allows us to. Most commonly, we will use your personal information in the following circumstances:

- Where we need to perform the contract we have entered into with you.
- Where we need to comply with a legal obligation, such as our legal obligation to maintain a register of members (Companies Act 2006/ Trustee Investment (Scotland) Act 2005).
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we wish to promote club services and events.
- When we respond to queries, questions or complaints.
- When we honour your booking in a competition or other event.
- Where we have explicit consent from you, e.g. use of photographs in the press or social media.

Situations in which we will use your personal information

We need all the categories of information in the list above primarily to allow us to service our membership contract with you, undertake our legitimate interests and to enable us to comply with legal obligations. The situations in which we will process your personal information are listed below:

- Provide you with core member services.
- Update you on dates of meetings, AGMs and competitions.
- Send you essential membership information such as renewal dates and fees.
- Promotion of the club in the press or social media (with explicit consent).

Change of purpose

We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so. Please note that we may process your personal information without your knowledge or consent, in compliance with the above rules, only where this is required or permitted by law.

WHAT HAPPENS IF YOU DO NOT PROVIDE PERSONAL INFORMATION TO THE CLUB

If you fail to provide certain information when requested, we may not be able to provide you with core membership services and benefits.

It is also important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during your membership with us.

AUTOMATED DECISION-MAKING

We do not envisage that any decisions will be taken about you using automated means, however we will notify you if this position changes.

DATA SHARING – WHY WE MAY NEED TO SHARE YOUR DATA

We may have to share your data with third parties, including third-party service providers. We require third parties to respect the security of your data and to treat it in accordance with the law. We do not anticipate transferring your personal information outside the EU. If we do, you can expect a similar degree of protection in respect of your personal information.

Why might you share my personal information with third parties?

We will share your personal information with third parties where required by law, where it is necessary to administer your membership, or where we have another legitimate and lawful interest in doing so.

Which third-party service providers process my personal information?

"Third parties" includes third-party service providers (including contractors and designated agents). The following activities are carried out by third-party service providers: pension administration and occupational health services. Other examples of third parties with whom we may share data:

- Health and Safety Executive
- Legal Advisors
- Police Scotland
- Disclosure Scotland
- Scottish Golf
- Master Scoreboard

How secure is my information with third-party service providers?

All our third-party service providers are required to take appropriate security measures to protect your personal information in line with our contractual terms and conditions. We do not allow our third-party service providers to use your personal data for their own purposes. We only permit them to process your personal data for specified purposes and in accordance with our instructions.

WE PROTECT YOUR DATA - DATA SECURITY

We have put in place measures to protect the security of your information. Third parties will only process your personal information on our instructions and where they have agreed to treat the information confidentially and to keep it secure.

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal information on our instructions and they are subject to a duty of confidentiality and must comply with the law. We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

HOW LONG WILL WE HOLD YOUR PERSONAL DATA?

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. Details of retention periods for different aspects of your personal information are available in our retention policy which is available on the club website (**insert link**). To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data,

the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

In some circumstances we may anonymise your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you. Once you are no longer an employee, worker or contractor of the company we will retain and securely destroy your personal information in accordance with our data retention policy and applicable laws and regulations.

YOUR DUTY TO INFORM US OF CHANGES

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during your membership. If you do not keep us informed of changes we may be prevented from supplying core services and benefits, and fulfilling our statutory duties.

YOUR RIGHTS OF ACCESS, CORRECTION, ERASURE, AND RESTRICTION

Under certain circumstances, by law you have the right to:

- Request access to your personal information (commonly known as a “data subject access request”). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- Request correction of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- Request erasure of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).
- Object to processing of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground.
- Request the restriction of processing of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- Request the transfer of your personal information to another party.
- If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact the Club Secretary in writing (see below for details).

No fee usually required

You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

RIGHT TO WITHDRAW CONSENT

In the limited circumstances where you may have provided your consent to the collection, , processing and transfer of your personal information for a specific purpose, or we process your data

for legitimate interests, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact the Club Secretary. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

CONTACT

The Club Secretary oversees compliance with this privacy notice. If you have any questions about this privacy notice or how we handle your personal information, please contact the Club Secretary, by emailing muthillgolfclub@btconnect.com. You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues.

CHANGES TO THIS PRIVACY NOTICE

We reserve the right to update this privacy notice at any time, and we will provide you with a new privacy notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information. This notice applies to current, prospective and former members. This notice does not form part of any contract of membership.