

Shetland Golf Club

Privacy Notice for GDPR (General Data Protection Regulations)

Effective from 25 May 2018

What we need

Shetland Golf Club is an independent club run by members, and it is a Scottish Charitable Incorporated Organisation (SCIO).

Shetland Golf Club will be a "controller" of the personal information that you provide to us unless otherwise stated.

Members' personal data:

When you register as a member of Shetland Golf Club or renew your membership (including if you are registering or renewing on behalf of a child under the age of 16), we will ask you for the following personal information:

- name, address, email address, date of birth, etc.;
- membership category for example, adult, senior, junior, etc.;
- payment details bank account number, sort code, card details, etc.;
- mandatory certificates, e.g. PVG, servicewise, food hygiene.;

• participation details – for example, parent, committee, coach, etc. ;

Why we need your personal information – contractual purposes

Members' personal data:

We need to collect our members' personal information so that we can manage your membership. We will use our members' personal information to:

- set up your online membership account and handicap record on Handicapmaster and Masterscoreboard
- send you membership communications, by post or email, in relation to essential membership services, including but not limited to, general meeting notices membership renewals, membership fees' information, etc.

If you do not provide us with all of the personal information that we need to collect then this may affect our ability to offer the above membership services.

Why we need your personal information – legitimate purposes

Members' personal data:

We also process our members' personal information in pursuit of our legitimate interests to:

 promote and encourage participation in golf by sending members' communications and booking information for upcoming competitions and events. Our competitions and events may be filmed or photographed and your personal information may also be used in images captured from our competitions and events, which we use for promotional, education and development purposes;

- provide golf competitions by accepting and managing entries for our competitions and checking your personal information to ensure you are entered into the correct category;
- monitor and develop participation in golf by monitoring members' engagement and participation and inviting our members to participate in surveys for researching and development purposes;
- develop and maintain our members' qualifications, including sending email communications to members to inform you of upcoming courses, renewal requirements and verify that you have completed any mandatory training and PVG / child protection requirements;
- respond to and communicate with members regarding your questions, comments, support needs or complaints, concerns or allegations made. We will use your personal information to investigate your complaint, to suspend membership, take disciplinary action, etc.;

Where we process your personal information in pursuit of our legitimate interests, you have the right to object to us using your personal information for the above purposes. If you wish to object to any of the above processing, please contact us on <u>info@shetlandgolfclub.co.uk</u>.

If we agree and comply with your objection, this may affect our ability to undertake the tasks above for the benefit of you as a member

Volunteers' personal data:

We will need to collect personal information relating to criminal convictions or alleged commission of criminal offences where you are required to complete a PVG check under the Protection of Vulnerable Groups (Scotland) Act 2007. This information will include your PVG certificate number, PVG membership number, date of issue and any relevant information in relation to your membership of the PVG Scheme.

If your PVG certificate is not clear, we will have a legitimate interest to collect references and any other applicable information to allow us to consider whether or not you can volunteer in a regulated role with children and/or vulnerable adults.

Where we process your personal information in pursuit of our legitimate interests, you have the right to object to us using your personal information for the above purposes. If you wish to object to any of the above processing, please contact us. If we comply with your objection, this may affect our ability to undertake the tasks above for the benefit of you as a volunteer.

Why we need your personal information – legal obligations

- the Charities and Trustee Investment (Scotland) Act 2005 requires us to maintain a register of our members, which includes our members' name, address, the date they were admitted to membership and the date on which they ceased to be our member.
- the Protection of Vulnerable Groups (Scotland) Act 2007 to check that our coaches and volunteers are able to undertake regulated work with children and vulnerable adults.
- the Equality Act 2010, which requires us to process personal information to make reasonable adjustments where necessary.

Other uses of your personal information

We may ask you if we can process your personal information for additional purposes. Where we do so, we will provide you with an additional privacy notice with information on how we will use your information for these additional purposes.

Who we share your personal information with

If your personal information is included in any images or videos taken by us at our competitions and events, we may share this with Scottish Golf for promotional and/or journalistic purposes.

We may be required to share personal information with statutory or regulatory authorities and organisations to comply with statutory obligations. Such organisations include the Health

& Safety Executive, Disclosure Scotland, and Police Scotland for the purposes of safeguarding children.

We may also share personal information with our professional and legal advisors for the purposes of taking advice.

Shetland Golf Club employs third party suppliers to provide services, including direct debit banking. These suppliers may process personal information on our behalf as "processors" and are subject to written contractual conditions to only process that personal information under our instructions and protect it.

In the event that we do share personal information with external third parties, we will only share such personal information strictly required for the specific purposes and take reasonable steps to ensure that recipients shall only process the disclosed personal information in accordance with those purposes.

Scottish Golf members' personal data

As an affiliated club of Scottish Golf we are required to ensure that all of our members are members of Scottish Golf as a condition of our affiliation. We will share your name and handicap details with Scottish Golf who will become a controller of your personal information when they receive it. Scottish Golf's privacy notice explains how they use your personal information. www.scottishgolf.org

How we protect your personal information

Your personal information is stored on our electronic filing system and our servers based in the UK / EU, and is accessed by our volunteers for the purposes set out above.

Where your personal information is transferred outwith the EU, we will provide you with information regarding the safeguards that we have put in place with the recipient country to protect your personal information.

How long we keep your personal information

Members' personal data

We will only keep your personal information for as long as necessary to provide you with membership services. Unless you ask us not to, we will review and possibly delete your personal information where you have not renewed your membership with us for three years.

We will keep certain personal information of members for longer in order to confirm your identity, when you were a member of Shetland Golf Club and for how long. We need to do this to keep a register of members in the event of a claim against SGC.

Your rights

You can exercise any of the following rights by writing to us

at info@shetlandgolfclub.co.uk.

Your rights in relation to your personal information are:

- you have a right to request access to the personal information that we hold about you by making a "subject access request";
- if you believe that any of your personal information is inaccurate or incomplete, you have a right to request that we correct or complete your personal information;
- you have a right to request that we restrict the processing of your personal information for specific purposes; and
- if you wish us to delete your personal information, you may request that we do so.

Any requests received by Shetland Golf Club will be considered under applicable data protection legislation. If you remain dissatisfied, you have a right to raise a complaint with the Information Commissioner's Office at www.ico.org.