

Muckhart Golf Club Ltd (“MGC”) GDPR Privacy Notice - 18th May 2018

General Data Protection Regulation

New regulations protecting your personal data, and setting down new data protection rights, take effect from 25th May 2018. This letter summarises the key matters for you, as a member of the Club.

Why we need your personal information – contractual purposes

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

- provide you with core member services, including, insurance, licensing and PVG checks;
- set up your online membership account and administer your account online; and
- send you membership communications by post or email in relation to essential membership services, including but not limited to, membership renewals and information on membership benefits. 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 and benefits.

Why we need your personal information – legitimate purposes

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

- promote and encourage participation in the sports of golf and footgolf 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 competition in the sports of golf and footgolf by accepting and managing entries for our competitions and checking your personal information to ensure you are entered into the correct category;
- respond to and communicate with members regarding your questions, comments, support needs or complaints, concerns or allegations in relation to the sports of golf and footgolf. We will use your personal information to investigate your complaint, suspend membership and take disciplinary action where appropriate.

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 enquiries@muckhartgolf.com. 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.

Why we need your personal information – legal obligations

We are under a legal obligation to process certain personal information relating to our members for the purposes of complying with our obligations under the Protection of Vulnerable Groups (Scotland) Act 2007 to check that our coaches and volunteers are able to

undertake regulated work with children.

What personal data does the Club hold for you and why?

In managing the Club, the Board considers that it has a legitimate interest in holding your personal data to ensure that the correct subscriptions are received under the payment process agreed with you, and that sufficient personal details are held to communicate directly with you, plus facilitate member communications directly with each other to participate in Club competitions. This data includes your name, address, phone number, email address, ("contact information"), your gender, date of birth, date of joining the Club, and your banking details (when required).

Additional information may be held in specific circumstances. For example, any applications made under Child Protection Disclosure are held for legal reasons, or in the unfortunate event of an accident on the course, medical information may be requested.

Who we share your personal information with

Your personal data records are held and maintained for our Club by the Club Secretary. In most circumstances, only authorised Club office staff or Club officials have access to this information. The exception to the above is in respect of the BRS system (Club course bookings), where the Shop staff have authorised access into the system, to help manage the Club services which are sub-contracted to these other parties.

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.

The Club will not pass your personal information onto any other 3rd party, without your consent.

Members who are registered with HowDidIDo (part of Club Systems International Ltd) will also have personal data held by this 3rd party, (eg handicaps) under a separate agreement with HowDidIDo. When registering with HowDidIDo, if you agree with that organisation, then the Club will pass your competition performance scores directly to HowdidIDo, with that organisation contacting you with the competition results, and any changes to member handicaps.

Is the data held securely?

Information is held on a number of different systems, and access to any system is restricted to those who require that specific information to undertake a specific function. Any paper records, eg Club membership application forms, are held in the office which is locked when not in use by authorised officials with key access restricted to these authorised officials.

The Club use a range of standard systems packages to support member services, (eg the BRS tee booking system) and therefore also hold data electronically. In today's technological environment such data is held "in the cloud", rather than on IT servers within the Clubhouse, and such data may be held outwith EEA (ie beyond the geographical boundaries of countries directly subject to these European regulations). However, in such circumstances EU Standard Contractual Clauses (also called Model Clauses and published by the European Commission) apply to protect EU data.

How long will the personal data be held by the Club?

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 six years.

What are your data protection rights?

The new data protection regulations also set down your rights, in terms of the Club holding your personal data, specifically your rights to:-

- i be informed regarding what data is being held, and why
- ii to have access to the data being held to verify accuracy
- iii to have any errors in the data rectified
- iv to request the erasure of the data being held

(The regulations also include other rights for individuals in terms of direct marketing, data portability, and automated decision making. Other than providing you with information in respect of Club events and services (including Catering and the Professional's shop) these uses of data are not undertaken by the Club in respect of your personal data.)

Who do you contact for more information?

The Club takes actions aiming to ensure that member contact details are kept up to date, and we ask that members keep their personal information up to date by advising the Club Secretary of any changes. Members do have the right to see what data we are holding in respect of their personal record, and such access requests should be referred directly in writing to: The Club Secretary, Muckhart Golf Club Ltd, Drumburn Road, Muckhart FK14 7JH

Please note that any requests to erase any member records will only be agreed if there is no over-riding requirement for the Club to continue holding the records to allow full and proper management of the Club, including the need to maintain historical records for preparation of the accounts.

The Club has not appointed a formal Data Protection Officer to maintain ongoing review of our Club policies and practices in this important area, although the Club Board will formally review the data protection practices regularly, and at least annually.

You can find more information about the new regulations from the Information Commissioner's Office, including the right to complain to the supervisory authorities, contact details on www.ico.org.uk

In conclusion, the Club Board has undertaken a review of our Club systems and processes, as they relate to members personal data, has put in place procedures to ensure the proper use of the data for Club membership purposes only, and has set down review procedures in terms of assessing information security. A copy of the formal Club GDPR Policy is available on request

If you have any queries and/or concerns regarding these matters, please direct these to the Club Manager either in writing at the above address or by email to enquiries@muckhartgolf.com