



Torwoodlee Golf Club

General Data Protection Regulations

Privacy Notice

Introduction

Torwoodlee Golf Club is a Club affiliated to Scottish Golf Limited (S.G.L) and a member club of the Border Golfers Association (B.G.A) and Border Ladies Golf Association (B.L.G.A). New Regulations protecting your personal data, and setting down new data protection rights, take effect from 25th May 2018. These are the General Data Protection Regulations (GDPR) and this Notice summarises the key matters for you, as a member of the Club.

What we need

Torwoodlee Golf Club will be a “controller” of the personal information that you provide to us either through completion of our membership application form or through completion of fields through our online booking software hosted by (BRS GOLF) or Membership/Handicapping software “Clubv1” hosted by (CLUB SYSTEMS) which also includes the Clubv1 members hub app. When you register as a member of Torwoodlee Golf Club, renew your membership (including if you are registering on behalf of a minor or register to compete in an open golf event) we may ask you for the following personal information:

- Contact details – name, address, email address, date of birth, telephone contact numbers
- Payment details – bank account number, sort code, card details etc.
- Golf Handicap details – previous club, C.D.H number, current golf handicap.

Why we need your data – Contractual Purposes

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

- Setup your Club membership account on our ClubV1 Membership & E.P.O.S system;
- Send you membership communications (By post and or by Email) in relation to essential membership services;
- 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 for live streaming purposes 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 golf by accepting and managing entries for our competitions and checking your personal information to ensure you are entered in to 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;
- Invite our members as award winners or guests to our annual presentation evening, which includes asking our members to nominate individuals for awards and shortlisting such individuals to select the winners, who we will then contact;
- Communicate with members to relay information on coaching/training/awards by Scottish Golf or local area associations;
- 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 / safeguarding requirements;
- Respond to and communicate with members regarding your questions, comments, support needs or complaints, concerns or allegations in relation to golf;
- When you book a place with us for and attend a coaching course, competition, event, training course, etc., we need to collect your personal information so that we can honour your booking and to enable you to participate in the course, competition, event, etc.; and 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 agree and comply with your objection, this may affect our ability to undertake the tasks above for the benefit of you as a golfer, volunteer or competitor.

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 you can volunteer in a regulated role with children and/or protected 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

We are under a legal obligation to process certain personal information relating to our golfers, volunteers, players, etc. 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 and protected 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 for promotional and/or journalistic purposes. Your personal information collected from participation in an event may be shared with our patrons, sponsors and partners for specific purposes only.

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, Children 1st, Professional Golfers Association (PGA) and Police Scotland for the purposes of safeguarding children and/or protected adults.

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

Torwoodlee Golf Club employs third party suppliers to provide services, including CDH, Golf box (Scottish Golf Limited), Visitor Bookings (BRS GOLF) and Membership/E.P.O.S. (CLUB SYSTEMS). 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. If 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.

Players personal data

We publish the results of our competitions on our website. These may include competitors’ name, age category, home club or country, county/area, result.

We may also be required to share personal information relating to players’ health in order to undertake activities to eliminate doping, at a sporting event, within our sport generally, or to provide information about doping, or suspected doping, to UK Anti-Doping or another body with responsibility for eliminating doping in our sport.

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 staff / volunteers for the purposes set out above. Some limited data may be held as hard copy in a secure location with restricted access.

How long we keep your personal information

On resignation from the club your personal data records will normally be retained by the club for up to 3 years, or longer in the event of legal actions against the club, or in the event that the member has outstanding subscriptions or card balance when leaving the club. We do have to retain your name only for accounting purposes as your name is linked to financial transactions on our E.P.O.S system.

Electronic payments

Torwoodlee Golf Club complies with the security requirements of the credit card Payment Card Industry Data Security Standard (PCI DSS) Program and compliance is validated annually. PCI requirements apply to all systems that store, process, or transmit cardholder data. Electronic storage of cardholder data is not conducted or permitted.

Changes to our Privacy Policy

We keep our privacy policy under regular review and will place any updates on the notice board.

This privacy policy was last updated on 22nd May 2018

Your rights

You can exercise any of the following rights by writing to us F.A.O the Data Protection Officer, Torwoodlee Golf Club, Edinburgh Road, Galashiels, Selkirkshire. TD1 2NE or by email to torwoodleegolfclub@torwoodleegolfclub.com

Your rights in relation to your personal information are:

- 1) you have a right to request access to the personal information that we hold about you by making a “subject access request”;
- 2) 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;
- 3) you have a right to request that we restrict the processing of your personal information for specific purposes; and
- 4) if you wish us to delete your personal information, you may request that we do so.

Any requests received by Torwoodlee 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.uk

