

# **Helensburgh Golf Club Ltd (“HGC”) GDPR Privacy Notice - 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 personal information so that we can manage our business. We will use your personal information to:

- administer your booking online
- send you communications by post or email in relation to promotions related to the sport of golf at our Club

## **Why we need your personal information – legitimate purposes**

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

- promote and encourage participation in the sport of golf by sending 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 sport of golf 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 visitors regarding your questions, comments, support needs or complaints, concerns or allegations in relation to the sport of golf. We will use your personal information to investigate your complaint, improve services 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 [g.m@helensburghgolfclub.co.uk](mailto:g.m@helensburghgolfclub.co.uk) 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 Management Committee considers that it has a legitimate interest in holding your personal data to ensure that the correct green fees are received under the payment process agreed with you, and that sufficient personal details are held to communicate directly with you, plus facilitate communications directly with each other to participate in Club competitions, or visits. 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 in the Office. 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 Golf Professional and his/her employees 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, e.g. Open Entry 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 golf 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 suitable services. Unless you ask us not to, we will review and possibly delete your personal information.

### **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 General Manager 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 General Manager, 25 East Abercromby Street, Helensburgh, G84 9HZ.

Please note that any requests to erase any 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 or CASC (Community Amateur Sports Club).

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 Management Committee 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](http://www.ico.org.uk)

In conclusion, the Management Committee has undertaken a review of our Club systems and processes, as they relate to personal data, has put in place procedures to ensure the proper use of the data, and has set down review procedures in terms of assessing information security.

If you have any queries and/or concerns regarding these matters, please direct these to the General Manager either in writing at the above address or by email to [g.m@helensburghgolfclub.co.uk](mailto:g.m@helensburghgolfclub.co.uk)