

## TILlicOUNTRY GOLF CLUB PRIVACY NOTICE FOR EMPLOYEES

References to **we**, **our** or **us** in this privacy notice are to **TILlicOUNTRY GOLF CLUB**

We are committed to respecting your privacy. This notice is to explain how we may use personal information we collect before, during and after your employment with us. This notice explains how we comply with the law on data protection [ General Data Protection Regulations 2018 ] and what your rights are under them.

We have not appointed a Data Protection Officer to oversee our compliance with data protection laws as we not required to do so, but our **Club Council** will act as data 'Controller' and the Club Administrator will act as data 'Processor - details are set out in the "Contacting us" section at the end of this privacy notice.

### 1. **PERSONAL INFORMATION WE MAY COLLECT FROM YOU**

Depending on the type of employment in which you are engaged , we may ask you for and may hold **personal information** about yourself, such as :

- Personal data that allows us to contact you such as title, name, postal address, email address and telephone number(s);
- Date of birth
- References and other information included in a CV or cover letter or as part of the application process for employment.
- References we provide to you for potential future employers
- Your contract and conditions of employment with us.
- Sight of Identification documents such as passport and identity cards and necessary copies thereof.;
- Bank Account details so that we can make payments to you.
- Details required to allow us to discharge or duties with respect to HMRC – National Insurance and Tax code information.
- Retain records pertinent to HMRC for the required statutory period.
- Records of performance appraisal assessment.
- Personal Images of you in video and/or photographic form.
- Personal data required in any disciplinary and grievance process.
- Personal data in any instructions from you to us.

### 2. **SPECIAL CATEGORIES OF PERSONAL INFORMATION**

We may also collect, store and use the following "**special categories**" of more sensitive personal information regarding you.;

- Information about any **medical condition you declare to us** pertinent to the function of your employment. We will process personal data above on the basis that it is necessary for the establishment, exercise or defence of legal claims.

We may also collect criminal records information about you.

We will process it on the basis of legal obligations and exercising rights in the field of employment and social security and social protection law or on your explicit consent.

### 3. **WHERE WE COLLECT YOUR INFORMATION**

We typically collect personal information about you when you apply for employment with us and annually thereafter to confirm details are current..

#### 4. USES MADE OF THE INFORMATION

The table below describes the main purposes for which we process your personal information, the categories of your information involved and our lawful basis for being able to do this.

Purpose	Personal information used/held	Lawful basis
<p><b>To administer the terms of your contract with us and manage our relationship with you, including dealing with payments and deductions to HMRC.</b></p> <p><b>To comply with Health &amp; Safety at work act.</b></p> <p><b>To gather evidence for possible grievance or disciplinary hearings</b></p>	<p>All contact details. Identification details e.g.  National Insurance and Tax code details. Pay and deduction records.</p> <p>To record detail of any training courses you attend</p> <p>Minute of disciplinary hearings.</p>	<p>To enable us to properly manage and administer your employment with us.</p> <p>Based on our lawful '<b>Contract</b>' with you</p> <p>Based on our '<b>Legal Obligations</b>' to HMRC</p> <p>Based on '<b>Legal Obligations</b>' to you</p> <p>To fulfil our complaints handling procedure.</p> <p>Based on '<b>Legal Obligations</b>' to you</p>
<p><b>To record and hold electronic and paper records .</b></p> <p><b>To protect such information</b></p>	<p>All personal information pertinent to your employment.</p>	<p>To properly administer and manage your contract. To ensure we hold accessible information..</p> <p>Access to Authorised Users only.</p> <p><b>Based on 'Legitimate Interest'.</b></p>
<p><b>For the purposes of equal opportunities.</b></p>	<p>Personal data e.g. age gender.</p>	<p>To ensure compliance with legislation and provide an environment that is inclusive, fair and accessible.</p> <p><b>Based on 'Legitimate Interest' / 'Legal Obligation'</b></p>
<p><b>To ensure protection of vulnerable persons under Protection of Vulnerable Groups legislation.</b></p>	<p>Information about your criminal convictions and offences.</p>	<p>To provide a safe environment for vulnerable groups.</p> <p><b>Based on 'Special Category' / 'Legal Obligations' .</b></p>
<p><b>To assess your fitness to work.</b></p>	<p>Health and medical information you declare to us.</p>	<p>To consider your personal safety.</p> <p><b>Based on 'Special Category'.</b></p>
<p><b>For the purposes of promoting the club's activities. E.g Flyers/ adverts.</b></p>	<p>Images in video and/or photographic form. No other personal details</p>	<p>We will ask for your permission.</p> <p><b>Based on lawful ' Consent' and 'Legitimate Interest'</b></p>

For some of your personal information you will have a legal, contractual or other requirement or obligation for you to provide us with your personal information. If you do not provide us with the requested personal information we may not be able to admit you as an employee or we may not be able to properly perform our contract with you or comply with legal obligations and we may have to terminate your employment. For other personal information you may not be under an obligation to provide it to us, but if you do not provide it then we may not be able to properly perform our employment commitments to you.

Where you have given us your consent to use your personal information in a particular manner, you have the right to withdraw this consent at any time, which you may do by contacting us as described in the "Contacting us" section below.

Please note however that the withdrawal of your consent will not affect any use of the data made before you withdrew your consent and we may still be entitled to hold and process the relevant personal information to the extent that we are entitled to do so on bases other than your consent. Withdrawing consent may also have the same effects as not providing the information in the first place, for example we may no longer be able to fulfil certain employment commitments to you.

## 5. **DIRECT MARKETING**

We do not use direct marketing.

## 6. **DISCLOSURE OF YOUR PERSONAL INFORMATION**

We may share personal information with the following parties:

- **Any party approved by you.;**
- **Other service providers:** Your Workplace Pension provider, if enrolled
- **The Government or our regulators:** where we are required to do so by law or to assist with their investigations or initiatives.
- **Police, law enforcement and security services:** to assist with the investigation and prevention of crime and the protection of national security.

## 7. **TRANSFERRING YOUR PERSONAL INFORMATION INTERNATIONALLY**

The personal information we collect is not transferred to and stored in countries outside of the UK and the European Union.

## 8. **HOW LONG DO WE KEEP PERSONAL INFORMATION FOR?**

The duration for which we retain your personal information will differ depending on the type of information and the reason why we collected it from you. However, in some cases personal information may be retained on a long-term basis: for example, personal information that we need to retain for legal purposes will normally be retained in accordance with usual commercial practice and regulatory requirements. Generally, where there is no legal requirement we retain all physical and electronic records for a period of 1 years after termination of your contract or your last contact with us.. Exceptions to this rule are:

- CCTV records which are held for no more than 30 days unless we need to preserve the records for the purpose of prevention and detection of crime. **We do not currently use CCTV.**
- Information on personal details and reasons regarding unsuccessful employment applications or the outcome of any disciplinary issues are typically recorded in the minute of Council business meetings at which the decision(s) was taken and these are held for up to 5 years.
- Information that may be relevant to personal injury or discrimination claims may be retained until the limitation period for those types of claims has expired. For personal injury or discrimination claims this can be an extended period as the limitation period might not start to run until a long time after the event.

It is important to ensure that the personal information we hold about you is accurate and up-to-date, and you should let us know if anything changes, for example if you change your phone number or email address. You can contact us by using the details set out in the "**Contacting us**" section below.

## 9. **YOUR RIGHTS IN RELATION TO PERSONAL INFORMATION**

You have the following rights in relation to your personal information:

- the right to be informed about how your personal information is being used;
- the right to access the personal information we hold about you;
- the right to request the correction of inaccurate personal information we hold about you;
- the right to request the erasure of your personal information in certain limited circumstances;
- the right to restrict processing of your personal information where certain requirements are met;
- the right to object to the processing of your personal information;
- the right to request that we transfer elements of your data either to you or another service provider; and
- the right to object to certain automated decision-making processes using your personal information.

We do not use any automated decision-making processes using your personal information. You should note that some of these rights, for example the right to require us to transfer your data to another service provider, may not apply as they have specific requirements and exemptions which apply to them and they may not apply to personal information recorded and stored by us. .

Personal information is held securely. Access to all personal information is limited to defined Authorised Users. All data is held in the Club office which is locked when un-manned. Paper records are held in lockable filing cabinets. Electronic records are held on password protected accounts and the systems employ an industry standard anti-virus, anti-malware program. Loss of data is secured against by regular back-up to 'cloud 'services and / or to local secondary hard drives

This privacy notice sets out a general summary of your legal rights. More information about your legal rights can be found on the Information Commissioner's website at <https://ico.org.uk/for-the-public/>.

To exercise any of the above rights, or if you have any questions relating to your rights, please contact us by using the details set out in the "Contacting us" section below.

If you are unhappy with the way we are using your personal information you can also complain to the UK Information Commissioner's Office or your local data protection regulator. We are here to help and encourage you to contact us to resolve your complaint first.

## 10. **CHANGES TO THIS NOTICE**

We may update this privacy notice from time to time. When we change this notice in a material way, we will update the version date at the bottom of this page. For significant changes to this notice we will try to give you reasonable notice unless we are prevented from doing so. Where required by law we will seek your consent to changes in the way we use your personal information.

## 11. **CONTACTING US**

In the event of any query or complaint in connection with the information we hold about you, please email the data 'Processor ' at [tillygolf@btconnect.com](mailto:tillygolf@btconnect.com) or write to us the data 'Controller' at **Tillicoultry Golf Club, Alva Road, Tillicoultry FK13 6BL**

**Prepared by Club Secretary**  
**[ Approved by Club Council ]**  
**Version dated 25th May 2018**