

TILlicOUNTRY GOLF CLUB
PRIVACY NOTICE FOR MEMBERS

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 membership 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 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 membership you register for with us, we may obtain **personal information** about you, 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; Gender; emergency contacts
- Bank Account details so that we can receive payments from you.
- Credit/debit card details you provide so that we can receive payments from you.
- Details of financial transactions with you;
- Records of your or your guests attendance at any licensed events hosted in the Club
- 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.
- Personal records and assessment of your golfing handicap.

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 your safety in playing golf with us.

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 in relation to any interaction with vulnerable groups.

We will process it on the basis of legal obligations or based on your explicit consent.

3. WHERE WE COLLECT YOUR INFORMATION

We typically collect personal information about you when you apply to become a member of the club or when you renew your membership.,

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>To administer your membership with us and manage our relationship with you; notices of general meetings; renewal notices and general information.</p> <p>To comply with health and safety requirements by notifying you of relevant issues /procedures.</p> <p>To gather evidence for possible grievance or disciplinary hearings</p>	<p>All contact and membership details, Transaction and payment records..</p> <p>Minute of disciplinary hearings</p>	<p>To enable us to properly manage and administer your membership with us.</p> <p>To provide a safe golfing environment</p> <p>To fulfil our complaints handling procedure.</p> <p>Based on 'Legitimate Interest'</p>
<p>Retention of records; electronic and paper.</p>	<p>All personal information. Details held will be time limited.</p>	<p>To properly administer and manage your membership and run our club.</p> <p>Based on Legitimate Interest.</p>
<p>To protect your personal records</p>	<p>All personal details held on our IT systems and paper files.</p>	<p>Access to Authorised Users only.</p> <p>Based on 'Legitimate Interest'.</p>
<p>For the purposes of equal opportunities.</p>	<p>Personal data e.g. age gender.</p>	<p>To promote a sports environment that is inclusive, fair and accessible</p> <p>Based on 'Legitimate Interest' / 'Legal Obligation'</p>
<p>To ensure protection of vulnerable persons under Protection of Vulnerable Groups legislation.</p>	<p>Information about your criminal convictions and offences.</p>	<p>To provide a safe environment for vulnerable groups.</p> <p>Based on Legal Obligations .</p>
<p>To assess your fitness to participate in golf.</p>	<p>Health and medical information you declare to us.</p>	<p>To consider your personal safety.</p> <p>Based on 'Special Category'.</p>
<p>For the purposes of promoting the club, our events and membership packages.</p>	<p>Images in video and/or photographic form.</p>	<p>Where you have given us your explicit permission.</p> <p>Based on ' Consent'</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 a member 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 membership. 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 relationship with 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 provide certain member benefits 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.**
- **To any governing bodies or regional bodies for the sports covered by our club:** to allow them to properly administer the sports on a local, regional and national level.
- **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 year after your last contact with us or the end of your membership. Exceptions to this rule are:

- 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.
- Information on personal details and reasons we refuse membership or the outcome of any disciplinary issues are typically recorded in the minute of Council business meetings at which the decision was taken and these are held for up to 5 years.

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 automated decision making in relation to your personal data. 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 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