

# Privacy Policy At Milnathort Golf Club

Milnathort Golf Club are committed to protecting and respecting your privacy.

## *What we need*

Milnathort Golf Club will be a controller of the personal information that you have provided to us. When you register as a member of Milnathort Golf Club or renew your membership (including if you are registering or renewing on behalf of a child under the age of eighteen) we will ask you for the following personal information.

- Contact details – name, address, Tel. No. email address and date of birth
- Membership Criteria and associated data
- Equality information – gender

## *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:

- Contact you regarding queries raised regarding your membership
- Deal with entries into competitions
- Seek your views or comments on the services we provide
- Notify you of changes to our services
- Internal record keeping
- We may use the information to improve our product and services
- We may periodically send you information about special offers or other information which we think you may find interesting using the email address which you have provided.

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.

## **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 and vulnerable adults

## **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*

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. As an affiliated club of Scottish Golf Ltd we are required to ensure that all of our relevant members are members of Scottish Golf Ltd as a condition of affiliation. We will share your membership category with Scottish Golf Ltd who will become a controller of your personal information when they receive it.

In the event that 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.

## *How we protect your personal information*

Your personal information is stored on our electronic filing system and is accessed by our staff and volunteers for the purposes set out above.

## **How long we keep your personal information**

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 delete your personal information where you have not renewed your membership with us for six years.

### **Your rights**

You can exercise any of the following rights by writing to us at [milnathort.gc@btconnect.com](mailto:milnathort.gc@btconnect.com)

Your rights in relation to your personal information are:

- you have a right to request access to the personal information that we hold about you by making a “subject access request”;
  - 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; you have a right to request that we restrict the processing of your personal information for specific purposes; and
  - if you wish us to delete your personal information, you may request that we do so.
- Any requests received by Milnathort 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 Commissioners Office at [www.ico.org.uk](http://www.ico.org.uk)

## Privacy Policy Summary

Milnathort Golf Club holds and controls personal information about members and visitors. This policy explains what this information is, what we use it for and how we manage it.

The club gathers information as follows:			
<b>From Whom</b>	<b>Club Members</b>	<b>Visitor Competition Entrants</b>	<b>Staff</b>
<b>What information is collected</b>	Name	Name	Name
	Address	Address	Address
	Contact details	Contact details	Contact details
	D.O.B.	D.O.B.	D.O.B.
	Gender	Gender	Bank Account details
	Golf Handicap and CDH no	Golf Handicap and CDH no	NI no
		Home golf club name	
<b>Why/What is it for</b>	To enable effective club and member management.	For managing entries, organising tee-off times and recording results.	For managing staff, organising shifts and paying wages/salaries to bank accounts, pension contributions and tax to HMRC.

The club gathers information as follows:			
<b>When/How is it collected</b>	For contact details: When joining, by completion of paper application form, or during membership by notifying office.	At time of entering competition via the entry process, either on-line or by submission of paper entry form	At start of employment by completion of a new employee paper form.
	For Bank details: At any time by completion of paper form direct debit mandate		
<b>How is it used</b>	Members contact details are recorded on a fully hosted cloud-based golf club management system provided by Club Systems International Ltd. This system has the highest level of SSL certification (ie security) available. Club Systems Int Ltd privacy policy can be viewed at. <a href="http://www.howdidido.com/Home/PrivacyPolicy">http://www.howdidido.com/Home/PrivacyPolicy</a>	Contact and golf details are recorded on a fully hosted cloud-based golf club management system provided by Club Systems International Ltd. This system has the highest level of SSL certification (ie security) available. Club Systems Int Ltd privacy policy can be viewed at <a href="http://www.howdidido.com/Home/PrivacyPolicy">http://www.howdidido.com/Home/PrivacyPolicy</a>	Details are recorded on a fully hosted cloud based system provided by Sage which is used used for payroll.
	Milnathort Golf Club will retain former member details for a maximum period of 6 year after all outstanding issues (eg outstanding bills) are cleared for that member.	Milnathort Golf Club will retain this information for a maximum of 6 years following the competition.	
<b>Who is it shared with</b>	<b>Not shared</b>	<b>Not shared</b>	<b>Not shared</b>

## **Visitors to our Website (Cookie Policy)**

When you visit our website (the “Website”), you may provide us with two types of information: (i) Personal Information - which you knowingly choose to disclose, that is collected on an individual basis and is used in accordance with our Privacy Policy; and (ii) Website Use Information which is collected on an aggregate basis as you and others browse the Websites, and is used as set out in this Cookies Policy.

You can surf the Websites anonymously and access important information without revealing your identity. However, in order to provide a better service, we use “cookies” to measure your visits to our Websites, which make it easier for you to log on during future visits. A cookie is a small text file that our Websites store on your web browser and can later retrieve. These allow us to distinguish you from other users of the Websites, however this information does not allow us to identify you personally and you remain anonymous unless you have otherwise provided us with Personal Information.

Some of the cookies we use are essential for parts of the Websites to operate, for example to remember when you add a purchase to your shopping basket or to enable you to pay for a product securely. Others help us to provide you with a better browsing experience, for example by remembering when you have logged in and what your display preferences are. We may also use ‘analytical’ cookies (including Google Analytics) which allow us to recognise and count the number of visitors to our Websites and see how visitors move around the Websites. This helps us to improve the way our Websites work, for example, by ensuring that visitors can easily find what they need, and by telling us what features of the Websites are most popular.

If you choose not to delete and/or block cookies from the Websites, and continue to use the Websites, you are thereby consenting to our use of such cookies.

## **Access and Correction Rights**

You have the right to see details of the information that we hold about you. Contact the Club for this. We would encourage you to update your Personal Information promptly if it changes.

## **Changes to the Policy**

We reserve the right to modify, add or remove sections of this privacy policy at any time.