

# St Regulus Ladies' Golf Club

## Privacy Policy

St Regulus Ladies' Golf Club treats the privacy of its members very seriously and takes appropriate security measures to safeguard your privacy. This Policy explains how the Club protects and manages any personal data\* you share with us and that we hold about you, including how we collect, process and share that data.

*\*Personal data means any information that may be used to identify an individual, including, but not limited to, a first and last name, a home or other physical address and an email address or other contact information, whether at work or at home.*

*St Regulus Ladies' Golf Club will be a "controller" of the personal information that you provide to us.*

### **What information do we collect about you?**

We collect information about you when you join as a member of St Regulus Ladies' Golf Club or renew your membership (including if you are registering or renewing on behalf of a child under the age of 18). This includes name, address, date of birth, email address, contact telephone numbers and CDH number.

We may also require car registration details if you apply for and hold a local players car park pass.

If you volunteer to assist with the Junior section of St Regulus Ladies' Golf Club we will require PVG membership details.

We may also keep information contained in any correspondence you may have with us by post or by email.

### **Why we need your personal information - contractual purposes**

We use your information to administer and manage your membership. We will use our members' personal information to:

- set up your membership
- send you membership communications (by post or email) in relation to membership services/club activities/golf related matters etc

If you do not provide us with all of your personal information that we need to collect then this may affect our ability to offer the above membership services and benefits.

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

We also process our golfers' and volunteers' personal information in pursuit of our legitimate interests to:

- 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 into 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 awards dinner;
- develop and maintain our members' qualifications, including sending email communications to members to inform you of 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;
- communicate with members by email with information pertaining to golf club matters;
- to communicate with members in relation to major golfing events; Dunhill/Open/Ricoh Women's/British Open etc, held locally, to seek volunteers;
- personal data; name and contact telephone number made available to all members via the club website, in a secure members only section and also in the club house. To enable members to contact each other for the purpose of organising golf competitions/matches and other golf related matters;
- when you book a place with us to attend a coaching course, competition, event, training course, etc. we need to collect your personal information so that we can honour your booking 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, player.

### **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 or not 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 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 and volunteers for the purpose 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**

We share your information with external and internal data processors (ClubV1, Scottish Golf, R&A, Links Trust and HowDidIDo) however, your personal data is administered internally by the Club Administrator who adheres to the Golf Club's internal data protection policies and procedures.

If your personal information is included in any images taken by us at our competitions or events, we may share this for journalistic purposes. We also publish the results of our competitions in the local press. This will include the members name, handicap and result.

Car registration details are shared with The New Golf Club who administers the Local Players car park.

We may be required to share your information with statutory or regulatory authorities and organisations to comply with statutory obligations. Such organisations include Health and Safety Executive, Disclosure Scotland, Children 1st and Police Scotland for the purpose 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.

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.

## **Individual Rights**

You have the right to request a copy of the information we hold about you. If you would like a copy of this information please email us at [admin@st-regulus-lgc.co.uk](mailto:admin@st-regulus-lgc.co.uk) or write to the Club Administrator at the Club making a "subject access request"

The information is provided free of charge.

We want to make sure that your personal information is accurate and up to date you may ask us to correct or erase information that you think is inaccurate.

At the time of collecting data you have the right to object to the club holding certain information about you.

If you wish us to delete your personal information, you may request that we do so.

Any requests received by St Regulus Ladies 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](http://www.ico.org.uk)

## **How we protect your personal information**

Your personal information information is stored on our electronic filing system based in the UK and is accessed by our staff/Executive Committee/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 possibly delete your personal information where you have not renewed your membership with us for a year.

We have a data retention policy that sets out the periods for retaining and reviewing all information that we hold. This sets out different retention periods and you can request a copy by contacting us.

## **Changes to our privacy policy**

We keep our privacy policy under regular review and will place any updates on our website. This policy was last updated on the 16th April 2018.

## **How to contact us**

If you need any further information please email us at [admin@st-regulus-lgc.co.uk](mailto:admin@st-regulus-lgc.co.uk), write to us at 9 Pilmour Links, St Andrews, Fife, KY16 9JG or call us on 01334 477797.