



# PRIVACY AND CONSENT

## MEMBERS

The Club's Privacy Notice set out below covers all aspects of privacy and consent relating to members.

## PRIVACY NOTICE

### What we need

Lumphanan Golf Club (LGC) will be a "controller" of the personal information that you provide to us.

When you register as a member of LGC or renew your membership (including if you are registering or renewing on behalf of a child under the age of 18), we will ask you for the following personal information:

- contact details - name, address, email address, landline and mobile telephone numbers, and date of birth;
- membership category;
- membership of other golf clubs;
- handicap information.

### 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:

- maintain a record of your membership of the club;
- send you membership communications by post or email in relation to essential membership services, including, but not limited to, meeting notices, membership renewals, membership fees' information.

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.

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

We also process our members' 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 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 golf by accepting and managing entries for our competitions and checking your personal information to ensure you are entered into the correct category;
- support your participation in external competitions if you have agreed to participate in those;
- where relevant, develop and maintain our members' qualifications, including sending email communications to members to inform you of upcoming courses, renewal requirements and verify that you have completed any mandatory training and PVG / child protection requirements;
- respond to and communicate with members regarding your questions, comments, support needs or complaints, concerns or allegations in relation to golf.

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 the Secretary of LGC. 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.

### **Whom we share your personal information with**

If your personal information is included in any images or videos taken by us at our competitions and events, we may share this with local and golf media for promotional and/or journalistic purposes.

We may be required to share personal information with statutory or regulatory authorities and organisations to comply with statutory obligations. Such organisations include Disclosure 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.

We will share your name and handicap details with Scottish Golf Limited in order that they may maintain their records of members of affiliated clubs.

LGC uses Scottish Golf's Venue Management System to provide IT applications for website and handicap purposes. This system processes personal information on our behalf as "processor", and we only share such personal information strictly required

for the specific purposes and take reasonable steps to ensure that the system only processes 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 our servers based in the UK and is accessed by our club officials 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 five years.

We will keep certain personal information of members for longer in order to confirm your identity, when you were a member of LGC and for how long. We need to do this in the event of a claim against LGC.

### **Your rights**

You can exercise any of the following rights by writing to the Secretary of LGC, Main Road, Lumphanan AB31 4PW or emailing [secretary@lumphanangolfclub.co.uk](mailto:secretary@lumphanangolfclub.co.uk).

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 LGC 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)

### **VISITORS**

When visitors book to play the course they give consent for their personal information to be collected and retained as required.

In addition, when visitors enter a competition they give consent for their personal information to be collected in order to confirm entry and be provided with any competition specific information directly related to participation in the event.

Images may be taken of players and used in LGC's Facebook page and other social media. Parental consent is required for all visitor entrants under 16; this will be required to be completed on the day of play. By ticking "yes" parents are agreeing to the Terms / General Terms of the Competition and giving consent for their child to be entered, videoed or photographed. Should a visitor not wish to give consent for a child to be videoed and/or photographed this should be highlighted to the Registration Desk on the day of play.

February 2021