

Under data protection laws, we are required to provide you with certain information about who we are, how we process your personal data and for what purposes, and your rights in relation to your personal data. The relevant information is provided in this Privacy Notice and it is important that you read that information.

This privacy notice explains how Scottish Golf collects and processes personal data of its members. The organisation is committed to being transparent about how it collects and uses that data and in order to meet its data protection obligations.

## INTRODUCTION

Scottish Golf Limited is committed to protecting your personal data and respecting your privacy.

This policy applies to your use of;

- The Scottish Golf Mobile App (**App**) available on our website (**App Site**), once you have downloaded a copy of the App onto your mobile device (**Device**).
- The Scottish Golf Website (**Website**), once you have registered as a user.
- The Scottish Golf Venue Management System (**VMS**), once your club has registered as a user.
- Any of the services accessible through the App/Website/VMS (**Services**) that are available. This policy sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. These Services are not intended for children and we do not knowingly collect data relating to children. Please read the following carefully to understand our practices regarding your personal data and how we will treat it.

## WHAT WE NEED

Scottish Golf will be a “controller” of the personal information provided to us in this form/through this Website/App/VMS or through an approved software provider.

### Golfers/Competitors personal data:

When you register as a member of Scottish Golf; renew your membership (including if you are registering or renewing on behalf of a child under the age of 18); or register to compete in a Scottish Golf event or Scottish Golf endorsed event we may ask you for the following personal information:

- contact details – name, address, email address, gender, date of birth, contact number, home club, age etc;
- criteria – player, parent, volunteer, etc.;
- payment details – bank account number, sort code, card details, etc.;
- participation details – for example, club, courses you play, competitions you play, dates you play, your scores and information relating to your handicap;
- your Scottish Golf member login details;
- we may also automatically collect information and personal data about your computer for system administration including, where available, your IP address, operating system and browser type.
- equality information – for example, disability, etc.

### Volunteers personal data:

When you volunteer with Scottish Golf, we may ask you for the following personal information:

- contact details – name, address, email address, date of birth, etc.;
- participation details – for example, club, etc.;
- payment details – bank account number, sort code, card details, etc.;
- equality information – for example, disability, etc.; and
- any other personal information, for example, PVG membership, clothing sizes etc.

### Players personal data

When you are selected as a member of the Scottish Golf Academy, National Squad or National Team, we may ask you for the following personal information:

- Contact details – name, date of birth, address, email address, phone number, parents name, parents email, parents phone number, coaches name, coaches email

- Membership criteria – tier level, national squad
- Participation details – home club, area/county, CDH number
- Social media account details – Instagram, twitter, Facebook
- Medical information – allergies, dietary requirements, pre-existing medical conditions
- Passport details
- Clothing size

#### **Information that we receive from other sources:**

We receive personal data about you from golf clubs which are affiliated to us or via software providers acting on behalf of those clubs.

#### **WHY WE NEED YOUR PERSONAL INFORMATIONAL – CONTRACTUAL PURPOSES**

##### **Golfers, Volunteers and Players personal data:**

We need to collect personal information so that we can manage your membership. We will use our members' personal information to:

- set up your online membership account;
- ensure accurate player identification and issue a CDH number;
- send you membership communications [by post or email] in relation to essential membership services
- to provide you with your membership services.
- to calculate your handicap.
- to run golf competitions.
- to provide you with information that you request from us or which may be of interest to you;
- to notify you about changes to our services.
- to provide member support.
- to report to bodies such as Sport Scotland; and
- to develop and improve our services, website and platforms.

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 golfers', volunteers' and players' 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;
- administer and maintain the integrity of the handicapping system to be certain that a members handicap is a true reflection of ability;
- maintain appropriate membership records
- 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 / ceremony], which includes asking our clubs to nominate individuals for awards and shortlisting such individuals to select the winners, who we will then contact ;
- 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 / safeguarding requirements;
- respond to and communicate with members regarding your questions, comments, support needs or complaints, concerns or allegations in relation to golf;
- When you book a place with us for and attend a coaching course, competition, event, training course, etc., we need to collect your personal information so that we can honour your booking and to enable you to participate in the course, competition, event, etc.; and
- operate a safe and lawful business.

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 to 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, volunteers, players, etc. 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 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?**

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

Your personal information collected from participation in an event may be shared with our patrons, sponsors and partners for specific purposes only eg TheR&A in relation to WAGR calculations.

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, Children 1st, Professional Golfers Association (PGA) and Police Scotland for the purposes 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.

ScottishGolf employs third party suppliers to provide services, including [IT, CDH,VMS]. These suppliers may process personal information on our behalf as “processors” and are subject to written contractual conditions to only process that personal information under our instructions and protect it.

We may also share your data with

- other organisations involved in the calculation of your handicap.
- your home club, other affiliate golf clubs, relevant county golf organisation, or contractors or suppliers acting on behalf of those organisations;
- competition organisers and officials involved in competitions in which you take part, including contractors or suppliers acting on behalf of those organisations;
- other organisations involved in the calculation of your handicap, for example where you play at a club other than your home club we may provide them with your current handicap;

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.

#### **Players personal data**

We may publish handicapping data and the results of competitions on our website/App. These may include competitors' name, age category, home club or country, county/area, result, date played and handicap.

We may also be required to share personal information relating to players' health in order to undertake activities to eliminate doping, at a sporting event, within our sport generally, or to provide information about doping, or suspected doping, to UK Anti-Doping or another body with responsibility for eliminating doping in our sport.

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

Your personal information is stored on our electronic filing system and our servers based in the UK/ EU and is accessed by our staff / volunteers for the purposes set out above.

We are required to transfer your personal information out with the EU for the purposes entering players into competitions, booking travel arrangements for training camps, etc. Your personal information may be transferred to, and stored in, countries outside of the UK and EU for the above purposes. ScottishGolf will take steps to ensure your personal information is adequately protected in countries outside of the UK and EU. Please contact us if you would like more details on safeguards used by Scottish Golf to protect personal information for these transfers.

### **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.

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.

All records and documents relating too safeguarding and anti-doping matters will be retained ad infinitum under Section 21 of the Inquiries Act 2005.

### **SECURITY**

We place great importance on keeping your personal data safe and secure. As such, we put in place appropriate technical and organisational measures / industry standard technology to protect it from unauthorised access and unlawful processing, accidental loss, destruction and damage.

The security measures we use are designed to provide a level of protection security appropriate to the risk of processing your personal data.

Where you are responsible for protecting your online membership account login details and must not share them with or disclose them to anyone.

### **YOUR RIGHTS**

You can exercise any of the following rights by writing to us F.A.O Operations Manager, Scottish Golf Ltd, The Duke's, St Andrews, Fife KY16 8NX or by email to: [info@scottishgolf.org](mailto:info@scottishgolf.org)

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 Scottish Golf 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: [ico.org.uk](https://ico.org.uk)