



Scottish
Golf

Privacy Notice – Scottish Golf Mobile App

INSTALLATION OF THE APP

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.

Before installation of this App, please indicate that you have read and understand the information set out in this Privacy Notice.

YES I wish to install the App and I have read and understand the Privacy Notice.

INTRODUCTION

The Scottish Golf Mobile App (App) is operated by Scottish Golf under license from iOffice Ltd (trading as OCS Sport) and the OpenPlay service within the App is operated by Scottish Golf Enterprises Limited, which is wholly owned by Scottish Golf Limited.

Not all points discussed within this Privacy Notice shall be relevant to all users of the App (for example, certain points shall not be relevant to users that do not register for and use the OpenPlay function); however, this Privacy Notice sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. Please read the Privacy Notice carefully to understand our practices regarding your personal data and how we will treat it.

To view our child-friendly privacy notice, click [here](#).

Scottish Golf Limited and Scottish Golf Enterprises Limited are committed to protecting your personal data and respecting your privacy. All references to “we”, “us” and “our” in this Privacy Notice should be read as referring to Scottish Golf Enterprises Limited in respect of the OpenPlay service within the App, and to Scottish Golf Limited in respect of all other functions and services of the App.

This Privacy Notice (together with our end-user licence agreement as set out at End-User Licence Agreement (EULA), applies to your use of:

- The App once you have downloaded or streamed a copy of the App onto your mobile telephone or other device (Device); and
- Any of the services accessible through the App (Services).

WHO WE ARE, HOW TO CONTACT US AND OTHER IMPORTANT INFORMATION

We are the controllers and are responsible for your personal data. Please get in touch if you have any questions about how we use your personal data, or you wish to contact us about your legal rights or if you have any complaints or feedback about our use of your personal data. Please contact us at any time by sending an email to us at info@scottishgolf.org. If you wish to submit a complaint or express any concerns about our use of your personal data, please contact us in the first instance. We will do our best to resolve your complaint or address your concerns to your satisfaction. However, if you feel that we have not resolved your complaint or addressed your concerns, please note that you have right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues.

Changes to the Privacy Notice and your duty to inform us of changes

We keep our Privacy Notice under regular review. It may change and if it does, these changes will be posted on this page and, where appropriate, notified to you when you next start the App. On these occasions, the updated Privacy Notice may be displayed on-screen and you may be required to read and confirm your understanding of the changes to continue your use of the App or the Services.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during our relationship with you.

Third party links

The App and/or our websites may, from time to time, contain links to and from the websites of our affiliated golf clubs or our partner networks, advertisers and other affiliates. Please note that these websites and any services that may be accessible through them have their own privacy policies and that we do not accept any responsibility or liability for these policies or for any personal data that may be collected through these websites or services, such as Contact Data and Location Data (as defined below). Please check these policies before you submit any personal data to these websites or use these services.

THE PERSONAL DATA WE COLLECT ABOUT YOU

We may collect, use, store and transfer different kinds of personal data about you as follows:

- Identity Data: first name, last name, title, username or similar identifier, date of birth, gender.
- Contact Data: billing address, delivery address, email address and telephone numbers.
- Financial Data: bank account and payment card details.
- Transaction Data: includes details about payments to and from you, and details of tee time bookings and competition entries at golf clubs.
- Device Data: includes the type of Device you use, a unique device identifier (for example, your Device's IMEI number, the MAC address of the Device's wireless network interface, or the mobile phone number used by the Device), mobile network information, your mobile operating system, the type of mobile browser you use, and time zone setting.
- Profile Data: includes but is not limited to your username and password, details of your golf club membership, details of your golf handicap, details of your tee time bookings made using the App, details of your competitions entries made using the App, and details of your interests, preferences, feedback and survey responses.
- Location Data: your approximate location using your Device's GPS locator.
- Usage Data: includes details of how you use our App, Services and products and details of your visits to our App and any of our websites including, but not limited to, traffic data and other communication data, whether this is required for our own billing purposes or otherwise and the resources that you access.
- Marketing and Communications Data: includes your preferences in receiving marketing and promotions from us and our third parties and your communication preferences.

We do not collect any Special Category Personal Data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric data).

HOW IS YOUR PERSONAL DATA COLLECTED?

We will collect and process the following personal data about you:

- Information you give us. This is information (including Identity, Contact, Financial, and Marketing and Communications Data) you give to us about you by providing details or filling in forms on the App, or by corresponding with us. It includes information you provide when you download and/or register to use the App, subscribe to any of our Services, search for a Service, or enter any other competition, promotion or survey, and when you report a problem with an App, our Services, or any of our websites. If you contact us, we will keep a record of that correspondence.

- Information we collect about you and your Device. Currently, we do not use cookies or other tracking technologies on the App or on our website, although we may introduce these in future. If we do so, we shall notify you and provide details of the cookies and/or other tracking technologies that are being used.
- Location Data. We use GPS technology to determine your current location. Some of our location-enabled Services require your personal data for the feature to work. If you wish to use this particular feature, you will be asked to consent to your data being used for this purpose. You can withdraw your consent at any time by disabling Location Data in your settings or by notifying us via the App.
- Information we receive from other sources including third parties and publicly available sources. We will receive personal data about you from various third parties and public sources, including from our affiliated golf clubs in Scotland, our other business partners and affiliates and from our various third party service providers (including payment services), such as OCS Sport and other IT or software providers, analytics providers, advertising networks, search information providers, fraud prevention and credit reference agencies and providers of technical, payment and delivery services.

HOW WE USE YOUR PERSONAL DATA

We will only use your personal data when the law allows us to do so. Most commonly we will use your personal data in the following circumstances:

- Where we need to perform a contract, we are about to enter or have entered with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.

The table below sets out a description of the main ways we plan to use your personal data and which of the relevant lawful grounds for processing we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Please note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your personal data. Please contact us if you require details about the specific lawful ground we are relying on to process your personal data where more than one lawful ground has been set out in the table below.

We will only send you direct marketing communications by email or text if we have your consent. You have the right to withdraw that consent at any time by contacting us.

PURPOSES FOR WHICH WE WILL USE YOUR PERSONAL DATA

Categories of personal data	Purpose / Activity	Lawful basis for processing
Identity data Contact data Financial data Profile Data Marketing and communications data	To install the App and register you as a new App user.	Performance of a contract with you
All categories	To deliver our Services, manage handicaps process tee time bookings and competition entries at affiliated golf clubs in Scotland which are made by you using the App. As part of this, we will be required to share your Identity Data and Contact Data with the relevant affiliated golf club in order to enable you to proceed with the tee time booking or competition entry.	Performance of a contract with you

Identity data Contact data Financial data Profile Data	To register you for the Services and to manage payments and collect money owed to us.	Performance of a contract with you Necessary for our legitimate interests (to recover debts due to us)
Location Data	To enable you to use the App.	Performance of a contract with you
Identity data Contact data Profile Data	To manage our relationship with you including notifying you of changes to the App or any Services.	Performance of a contract with you Necessary for our legitimate interests (to keep records updated and to analyse how customers use our products/services) Necessary to comply with legal obligations
Identity data Contact data Financial data Profile Data Marketing and communications data	To enable you to participate in a prize draw, competition or complete a survey.	Performance of a contract with you Necessary for our legitimate interests (to analyse how customers use our products/services and to develop them and grow our business)
All categories	To administer and protect our business and the App including troubleshooting, data analysis and system testing.	Necessary to comply with legal obligations Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security)
All categories	To use data analytics to improve our App, our Services / products, our marketing, and our customer relationships and experiences.	Necessary for our legitimate interests (to analyse how customers use our products/services and to develop them and grow our business)
All categories	To provide you with information about tee time bookings and competitions at nearby golf clubs in Scotland. To deliver content and advertisements to you. To provide you with marketing and make recommendations to you about goods or services which may interest you. To measure and analyse the effectiveness of the advertising we serve you. To monitor trends so we can improve the App.	Performance of a contract with you Necessary for our legitimate interests (to develop our products/services and grow our business)

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis for that use/purpose.

MARKETING

We may use your personal data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which services, products, promotions and/or offers may be relevant for you for the purposes of marketing.

You will receive marketing materials from us if you have requested this information from us. You may also receive marketing materials from us via email if you have purchased services or products from us or engaged in negotiations with us in connection with our services or products, or if you have provided

us with your details when you entered a competition or registered for a promotion and, in each case, you have not opted out of receiving marketing materials. In these circumstances, we will provide you with marketing materials via email on the lawful basis that it is necessary for the purposes of our legitimate interests in developing and promoting our services and products and growing our business.

If you have provided us with your details and none of the above circumstances apply, you will only receive marketing materials from us via email in circumstances where you have provided your consent. In these circumstances, you have the right to withdraw your consent at any time to the use of your personal data for marketing purposes.

Opting out of marketing

You have the right to object at any time to the processing of your personal data for direct marketing purposes. If you object to such processing, we will cease to process your personal data for direct marketing purposes.

You can ask us to stop sending you marketing materials at any time by: (i) following the optout links on any marketing communication or email message sent to you; or (ii) contacting us by email at info@scottish.golf.

SECURITY OF YOUR PERSONAL DATA

While you are responsible for maintaining data security on your Device, for example by avoiding sharing your password and other login credentials for the App, we use a combination of technical tools and security procedures to safeguard your personal data from unauthorised access. Our computer systems utilise industry standard security measures designed to prevent unauthorised access, and we have in place contractual measures with our third-party service providers to require them to take appropriate steps to ensure the security of your personal data. We also have internal policies in place designed to minimise the risk of unauthorised access to your personal data.

Despite the security measures we implement, please be aware that the transmission of data via the Internet is not completely secure. As such, we cannot guarantee that personal data transmitted to us via the Internet will be completely secure and any transmission is at your own risk.

DISCLOSURES OF YOUR PERSONAL DATA

We may share your personal data with certain third parties for the purposes of operating the App and providing our services / products to you, including for the purpose of enabling you to use the App to book tee times and enter competitions at various golf clubs in Scotland. In particular, your personal data may be disclosed to the following categories of third parties:

- Other entities in our corporate group.
- Our affiliated golf clubs in Scotland which have agreed to allow tee time bookings and competition entries to be processed via the App – If you use the App to make a tee time booking or enter a competition at a golf club in Scotland, we will be required to share your personal data with the relevant golf club.
- Other national governing bodies for golf within the United Kingdom, for the purpose of sharing handicapping information for events in which your Scottish Golf handicap is accepted by that body.
- OCS Sport, which is the provider of the relevant IT / software services which enable us to operate the App.
- Our professional advisers, including lawyers, insurers, auditors, bankers, and financial organisations.
- Other third party service providers which provide services to us in connection with the operation of the App and the provision of our Services / products, including but not limited to: IT, software and system administration services and other technical services; website and app development services; data storage services; digital marketing services; online booking services; data analytics providers; fraud prevention and credit reference services; and payment processing services.
- Our business partners and affiliates and third parties with whom we may enter into negotiations in respect of a commercial agreement, e.g. joint business venture.
- Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets.

- HM Revenue & Customs or any other public authority or regulatory authority in circumstances where we are required to disclose personal data by law.

We require all third party service providers to respect the security of your personal data and to treat it in accordance with the law. We do not permit our third party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified, limited purposes and in accordance with our instructions and we ensure any such sharing is subject to suitable obligations relating to confidentiality and security (and in each case, there are suitable contractual provisions in place to cover our respective data protection obligations).

We also may share your personal data in response to subpoenas, court orders, or other legal process; to establish or exercise our legal rights; to defend against legal claims; as otherwise required by law; when we believe it is appropriate to investigate, prevent, or take action regarding illegal or suspected illegal activities; and to protect and defend the rights, property, or safety of us and others. If we are organised or restructured to another organisation, we may transfer personal data we hold to that organisation.

HOW LONG WE RETAIN YOUR PERSONAL DATA

We will retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. We will store your personal data securely in accordance with our obligations under data protection laws and will regularly review the purposes for which we are retaining your data. We will cleanse data periodically to the extent it is (or part of it is) no longer relevant for the legitimate purposes for which it was originally collected.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

If you delete the App and delete your account completely, we will usually delete all of your personal data promptly thereafter, unless we have an ongoing legitimate basis to continue holding your personal data.

If you delete the App and/or cancel your subscription to OpenPlay, but you don't delete your account completely, we will normally keep your personal data for 2 years following that deletion/cancellation, to enable a straightforward resumption to using the App (and OpenPlay if relevant) if you choose to resume using the App and/or to resume your subscription to OpenPlay. If you do not use the App or restart your subscription to OpenPlay at any time during the 2-year period following deletion of the App and/or cancellation of your subscription to OpenPlay, we will usually delete your personal data at the end of that period, unless we have an ongoing legitimate basis to continue holding your personal data.

INTERNATIONAL DATA TRANSFERS

The European Economic Area or "EEA" is deemed to have good standards when it comes to data privacy. As such, we limit the occasions when we need to transfer your personal data outside of the United Kingdom and the EEA. Nevertheless, please note that there may be instances where it may be necessary for us to transfer your personal data outside the EEA, e.g. if we use third party service providers from another country. In these circumstances we shall put in place suitable safeguards to ensure that your personal data is held securely. To the extent we are sharing data with a country that is deemed by the European Commission to not have adequate data protection standards, we will usually put in place standard model contractual clauses to govern that data sharing, in addition to any other safeguards that may be necessary in accordance with data protection laws. If you require further information about the safeguards put in place you can request it from us by contacting us by email at the email address set out above.

YOUR LEGAL RIGHTS IN RELATION YOUR PERSONAL DATA

Under data protection laws, you have a number of legal rights in relation to the personal data which we hold about you. We respect your legal rights in relation to your personal data and aim to uphold your rights in everything we do. Your legal rights include the following:

- Subject access right – you can ask us to provide you with a copy of the personal data which we hold about you and a description of how we use your personal data.
- Right to rectification – if you believe any personal data we hold about you may be inaccurate or incomplete, you can ask us to rectify these inaccuracies.
- Right to erasure / Right to be forgotten – you can ask us to erase your personal data in certain circumstances. However, please note that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- Right to data portability – where we process your personal data using automated means of processing on the basis of your consent or for the purposes of performing a contract with you, you can request that we supply such personal data to another party in a machine-readable format.
- Right to restriction of processing – you can ask us to restrict or suspend our processing of your personal data in certain limited circumstances.
- Right to object to processing – where we process your personal data on the lawful basis that such processing is necessary for the purposes of our legitimate interests, you have the right to object to us processing your personal data in certain circumstances.
- Right to object to processing for direct marketing purposes – you have the right to object at any time to the processing of your personal data for direct marketing purposes. If you object to us processing your personal data for direct marketing purposes, we will no longer process your personal data for such purposes.
- Right to withdraw consent – if we process your personal data on the basis of your consent, you have the right to withdraw your consent at any time to the processing of your personal data. However, please note that this will not affect the lawfulness of any processing of your personal data carried out before you withdraw your consent.

If you want to exercise any of these rights, please contact us. You don't have to pay a fee to exercise your rights, unless your request is clearly unfounded, repetitive or excessive (in which case we can charge a reasonable fee). Alternatively, we may refuse to comply with your request in these circumstances. Where your request is legitimate, we will always respond within one month (unless there is a legal reason to take longer, such as where your request is particularly complex). We may also need you to confirm your identity before we proceed with your request if it is not clear to us who is making the request.

In addition to the above, you may get in touch with the ICO if you are concerned about the way in which we are handling your personal data, or if you are an EEA individual and/or your concerns relate to us processing personal data regarding activities that you undertake/have undertaken within the EEA you may raise your concerns with the national data protection supervisory authority in the EEA Member State in which you are based.