

MEGC GDPR - Privacy Notice - Current Members (exc Juniors)

Merchants of Edinburgh Golf Club (the "Club")

General Data Protection Regulation

New regulations protecting your personal data, and setting down new data protection rights, take effect from 25th May 2018. This letter summarises the key matters for you, as a member of the Club.

What personal data does the Club hold for you and why?

In managing the Club, the Council considers that it has a legitimate interest in holding your personal data to ensure that the correct subscriptions are received under the payment process agreed with you, and that sufficient personal details are held to communicate directly with you, plus facilitate member communications directly with each other to participate in Club competitions. This data includes your name, address, phone number, email address, ("contact information"), your gender, date of birth, date of joining the Club, and your banking details (when required).

Additional information may be held in specific circumstances. For example, any applications made under Child Protection Disclosure are held for legal reasons, or in the unfortunate event of an accident on the course, medical information may be requested.

Who has access to your personal data?

Your personal data records are held and maintained for our Club by the Club Manager. In most circumstances, only authorised Club office staff or Club officials have access into this information. The exception to the above is in respect of the BRS system (Club course bookings), where the Professional /Shop staff and the Club Steward have authorised access into the system, to help manage the Club services which are sub-contracted to these other parties.

The Club will not pass your personal information onto any other 3rd party, without your consent.

Members who are registered with HowDidIDo (part of Club Systems International Ltd) will also have personal data held by this 3rd party, (eg handicaps) under a separate agreement with HowDidIDo. When registering with HowDidIDo, if you agree with that organisation, then the Club will pass your competition performance scores directly to HowdidIDo, with that organisation contacting you with the competition results, and any changes to member handicaps.

Is the data held securely?

Information is held on a number of different systems, and access on any system is always restricted to those who require that specific information to undertake a specific function. Any paper records, eg Club membership application forms, are held in a locked cupboard, and key access restricted to authorised officials.

The Club uses a range of standard systems packages to support member services, (eg the BRS tee booking system) and therefore also holds data electronically. In today's technological environment such data is held "in the cloud", rather than on IT servers within the Clubhouse, and such data may be held outwith EEA (ie beyond the geographical boundaries of countries directly subject to these European regulations). However, in such circumstances EU Standard Contractual Clauses (also called Model Clauses and published by the European Commission) apply to protect EU data.

How long will the personal data be held by the Club?

On resignation from the Club, your personal data records will normally be retained for up to 18 months, (until the approval of the Club Accounts which cover the accounting period inclusive of your final subscription payment). The records may be retained beyond this retention time frame in the event of legal actions (or potential legal actions) against the Club, or if a court order is received requiring the Club to retain a members data, or in the event that the member has outstanding subscriptions when leaving.

What are your data protection rights?

The new data protection regulations also set down your rights, in terms of the Club holding your personal data, specifically your rights to:-

- i. be informed regarding what data is being held, and why
- ii. to have access to the data being held to verify accuracy
- iii. to be able to rectify any errors in the data
- iv. to request the erasure of the data being held

(The regulations also include other rights for individuals in terms of direct marketing, data portability, and automated decision making. Other than providing you with information in respect of Club events and services (including Catering and the Professional's shop) these uses of data are not undertaken by the Club in respect of your personal data.)

Who do you contact for more information?

The Club takes actions aiming to ensure that member contact details are kept up to date, eg annual reminders to members, and we ask that members keep their personal information up to date, using the "hub" on the Club website. Members do have the right to see what data we are holding in respect of their personal record, and such access requests should be referred directly in writing to the Club Manager:-

Mrs Melanie Dobie, Merchants of Edinburgh Golf Club, 10 Craighill Gardens, Edinburgh, EH10 5PY

Please note that any requests to erase any member records will only be agreed if there is no over-riding requirement for the Club to continue holding the records to allow full and proper management of the Club, including the need to maintain historical records for preparation of the accounts.

The Club has appointed a formal Data Protection Officer to maintain ongoing review of our Club policies and practices in this important area, although the Club Council will formally review the data protection practices regularly, and at least annually.

You can find more information about the new regulations from the Information Commissioner's Office, including the right to complain to the supervisory authorities, contact details on www.ico.org.uk

In conclusion, the Council has undertaken a review of our Club systems and processes, as they relate to members personal data, has put in place procedures to ensure the proper use of the data for Club membership purposes only, and has set down review procedures in terms of assessing information security. A copy of the formal Club GDPR Policy can be accessed by members on the Club website or via the Club V1 Members' app, and members should note that any updates to the Club GDPR Policy will be published on both.

If you have any queries and/or concerns regarding these matters, please either contact Melanie Dobie, (Club Manager) or myself.

Thank you.

Jane Macdonald

MEGC Captain