

General Data Protection Regulation (GDPR) Policy Dated May 2018

What We Need

Montrose Golf Links will be a “controller” of the personal information that you provide to us.

Season Ticket Holders Personal Data

When you register as a Season Ticket Holder of Montrose Golf Links or renew your Season Ticket (including if you are registering or renewing on behalf of a child under the age of 18, we may ask you for all or some of the following personal information:

- Contact details - name, address, email address, date of birth, etc.
- Season Ticket criteria / category – for example, Adult, Junior, Gender etc.
- Bank Details - account number, sort code, card details, etc.
- Equality information – for example, disability, age, gender etc. and
- Any other personal information we may deem necessary to collect.

Why we need your personal information – Contractual Purposes:

We need to collect our Season Ticket Holders personal information so that we can manage your Season Ticket. We will use our Season Ticket Holders personal information to:

- Provide you with core Season Ticket Holder services.
- Set up your online tee time reservations account and give you access to the Season Ticket Holders’ area on our web site.
- Send you Season Ticket Holder communications by post or email in relation to essential Season Ticket services, including but not limited to, Season Ticket renewals, Season Ticket information, competition information etc.

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 Season Ticket services and benefits.

Visitors Personal Data:

When you book a place with us for Golf and attend any event, competition etc, we need to collect your personal information so that we can honour your booking and to enable you to participate in the event, competition etc.

If you do not provide us with all of the personal information that we need to collect then this may affect our ability to book your place.

Why we need your personal information – Legitimate Purposes:

We also process our Visitors personal information in pursuit of our legitimate interests to:

- Promote and encourage participation in Golf by sending Season Ticket Holders 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;
- Monitor and develop participation in Golf by monitoring Season Ticket Holders' engagement and participation and inviting our Season Ticket Holders to participate in surveys for researching and development purposes;

Training and PVG / child protection requirements;

Respond to and communicate with Season Ticket Holders regarding your questions, comments, support needs or complaints, concerns or allegations in relation to Golf or to our business. We will use your personal information to investigate your complaint, to suspend a Season Ticket, take disciplinary action, etc.

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 by email to admin@montrosegolflinks.com. 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 Season Ticket Holder.

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 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 vulnerable 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 by email to admin@montrosegolflinks.com. 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:

- The Protection of Vulnerable Groups (Scotland) Act 2007 requires us to check that our coaches and volunteers are able to undertake regulated work with children and vulnerable 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 our competitions and events, we may share this with third parties 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 the Health & Safety Executive, Disclosure Scotland, and Police Scotland for the purposes of safeguarding children and vulnerable adults.

We may also share personal information with our professional and legal advisors for the purposes of taking advice.

Montrose Golf Links employs third party suppliers to provide services, including IT, payroll, etc. 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.

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.

Participants’ Personal Data

We publish the results of our competitions on our website and may send them to third parties such as newspapers etc. This may include competitors’ name, age, and gender.

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 for the purposes set out above.

If we are required to transfer your personal information out with the EU we will provide you with information regarding the safeguards that we have put in place with the recipient country to protect your personal information.

We may use Mail Chimp from time to time to send our email communications. We understand that Mail Chimp’s servers are based in the US but have signed up to the “Privacy Shield”, which is an agreement between the US and EU Commission relating to the protection of personal data – this constitutes a “safeguard” under the GDPR.

How long we keep your personal information

Season Ticket Holders personal data

We will keep your personal information for as long as necessary to provide you with Season Ticket Holder services. If you chose not to renew your Season Ticket with us we will still keep certain personal information of ex Season Ticket Holders for longer in order to confirm your identity, when you were a Season Ticket Holder of Montrose Golf Links and for how long. We need to do this to comply with the Companies Act 2006, which requires us to keep a register of Season Ticket Holders or in the event of a claim against Montrose Golf Links.

Legitimate Interests

In addition to the foregoing we also use email data for the purpose of direct marketing. The lawful basis that we use for this processing is "Legitimate Interest". This is covered in the GDPR. The Information Commissioners Office (ICO) recommend that companies using this basis conduct a "Legitimate Interests Assessment" (LIA) and we have done this. A copy of our Legitimate Interests Assessment (LIA) is available by emailing us at admin@montrosegolflinks.com.

Your rights

You can exercise any of the following rights by writing to us at Montrose Golf Links, Traill Drive, Montrose, DD10 8SW or by emailing us at admin@montrosegolflinks.com.

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 Montrose Golf Links 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