



Privacy Notice - Cairngorm Ski Club

Introduction

Welcome to Cairngorm Ski Club's privacy notice.

We respect privacy and are committed to protecting personal data. This privacy notice will inform you as to how we look after personal data and tells you about your privacy rights and how the law protects you. As a general rule, we are unlikely to collect any personal data from you unless you are a member, worker, or other volunteer/trustee with us.

1. Important information and who we are

Purpose of this privacy notice

This privacy notice aims to give you information on how we collect and process your personal data through (for example); your use of our website, our Facebook page, our e-newsletter and by using WebCollect. It is important that you read this privacy notice so that you are fully aware of how and why we are using your data.

Controller

Cairngorm Ski Club are the controller and are responsible for your personal data. We have a data privacy manager who is responsible for overseeing questions in relation to this privacy notice. If you have any questions about this notice, including any requests to exercise any legal rights, please contact the data privacy manager using the details set out below. As well as acting in accordance with this policy, we will otherwise always comply with any relevant data protection principles.

Contact details

Our full details are: Cairngorm Ski Club

Full name of legal entity: Cairngorm Ski Club SCIO

Name or title of data privacy manager: Tanera Astley, Club Secretary

Email address: secretary@cairngormskiclub.co.uk

Postal address: Easter Tomloan, Littlemill, Nairnshire IV125UU

Cairngorm Ski Club is a Scottish Charitable Incorporated Organisation

Charity number SC047401

Telephone number: 01309 651355

Changes to the privacy notice and your duty to inform us of changes

This version was last updated on 25 May 2018. 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 your relationship with us. The best way to do this will be by adjusting such information on WebCollect but, if you are having any difficulty with this, please contact Tanera Astley, Club Secretary, secretary@cairngormskiclub.co.uk

Third-party links

This website, and our Facebook page, may include links to third-party websites, plug-ins and applications. Clicking on those links, or enabling those connections, may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

2. The data we collect about you and how we collect it

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data). We may collect, use, store and transfer certain limited personal data about you which we have grouped together below - on the basis of where such processing might take place. It is felt this should make the policy easier to understand and we explain our legal basis for such processing within each section.

WebCollect

We have an agreement with WebCollect whereby they will perform certain processing activities and effectively act as our membership management system/database. A link, to WebCollect's own privacy policy (including its security undertakings) can be found in the "security" section, below.

Different categories of membership can be entered into, through this system. The membership process should only ask you about certain basic personal information, such as you (or your child's); sex, date of birth, address, telephone number and email address. If you are concerned you are being asked information beyond this you should contact our data privacy manager. This information is sought so we can effectively carry out our purposes in terms of what is an effective membership **contract** you have/may have with us. Otherwise, such processing takes place in furtherance of our **legitimate interests** (not outweighed by your own rights), in providing effective administration toward our main purposes. We require to know, for example, the numbers and types of members so we can arrange appropriate activities/coaching.

For the purposes of our activities a "child" is considered anybody who is 21 years and under. Any child therefore requires an appropriate parent/guardian to input any relevant details into WebCollect. Parents/guardians should, (but with regard to a child's age), seek their consent to input such details. However, we would ask that "child" consent, is expressly sought for those between the ages of 16-21.

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Only the following of our individual trustees and employees will have access to information stored within WebCollect; Coaching Trustee; Chair; Social Trustee; Treasurer; Secretary; Development Trustee; Development Officer Fiona Keir, Head Coach Gary Todd.

Mailchimp (e-newsletter)

We also have a relevant processing agreement with Mailchimp. This is how we distribute relevant e-newsletters to members, to keep them up to date with our activities and advise them (for example) of any relevant fundraising. You can unsubscribe, to such newsletters, at any time and the legal basis for sending them is the performance of the membership **contract** or, alternatively, our **legitimate interests** (which are not outweighed by your own rights).

Website/Facebook

Other than limited information about trustees (see below), no member personal data should be on the website. If you have a concern that personal data is otherwise on the website, then please contact the data privacy manager.

We have a Facebook page, which is for our members only. You require to be accepted, following on from becoming a member through WebCollect. We shall not put personal data on Facebook other than, for example, to ensure members have appropriate and up to date contact details for a trustee/coach and at short notice. We may (for example) otherwise put members names up, together with relevant timings, and might otherwise use names to promote club news. To the extent this might be considered personal data it must be stressed this is a members' only page and the basis for such activity is either the membership **contract** or our **legitimate interests** (not outweighed by your own rights).

Relevant Trustees

We are required, by OSCR and under relevant charities legislation, to have a relevant list of all current trustees. This confirms the following necessary information; name, position held, address, telephone number and email address. A relevant **legal or regulatory requirement** is therefore our basis for such list. Such document shall only be circulated around the current trustees, unless with individual trustee consent, or otherwise as may be required by any regulatory/supervisory body.

Trustees shall receive regular emails, regarding our ongoing business through a relevant "distribution list". Our legal basis for doing this is as part of a trustees' **official functions**, which are considered also to have a wider public benefit, or (alternatively) in line with the **legitimate interests** we pursue. We may also include trustee names, and their club email addresses, on our website which is again in our **legitimate interest** to properly administer the club.

Employment/Work

We currently engage a Head Coach, and other seasonal coaches, but may engage further coaches. Our head coach is an employee and seasonal coaches are "workers". We therefore require certain additional information from them, including; national insurance number and bank details. Our basis for holding this information is in the pursuance of a **contract** with them.

We also may require to take certain additional information from such persons, in order (for example) to proceed with any PVG/"Disclosure Scotland" application, or to confirm certain qualifications. This shall also be done in pursuance of a **contract** we have with such persons, or due to a relevant **regulatory** requirement. Additionally, we may require to disclose such relevant information for other **regulatory** (OSCR) reasons, or otherwise as may be **required by law** (HM Revenue & Customs).

Only the following individual members/trustees shall have access to such information; Treasurer, Coaching Trustee, Child Protection Officer. In the case of PVG/Disclosure forms, unless 'flagged', then only CPO has access.

Special Categories of Personal Data

We do not usually hold special category 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). Nor do we collect any information about criminal convictions and offences.

However, we may require relevant **health**/medical information from you (or on behalf of your child). This is in order to better safeguard your own (or your child's) safety and wellbeing. We will ask for **explicit consent** for such information from you, or you - on behalf of your child.

Additionally, we may also require relevant **health**/medical information from employees (or workers) but we will do so on the basis that we are exercising rights in the **field of employment**, or for the assessment of the **working capacity** of an employee/worker.

Only the following persons /members/trustees/ shall have access to such information; Coaching Trustee, Head Coach, Treasurer, Secretary, Club training camp manager, Head Coach

3. How we use your personal data

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances (as already outlined above):

- Where we need to perform the "membership contract" you have entered into with us.
- Where it is necessary for our legitimate interests (and your rights do not override such interests).
- Where we need to comply with a legal, or regulatory, obligation.
- Where, failing any of the above, it is considered we have your valid "consent" to do so.

Third-party marketing

We will get your express opt-in consent before we share your personal data with any company for marketing purposes. This is not an activity we currently pursue, or intend to pursue.

Opting out

You can ask us to stop sending you our e-newsletters at any time. If you wish to opt-out of our e-newsletters you can unsubscribe at any time.

Cookies

There are no Cookies on our website.

Change of purpose

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 you wish to get an explanation, as to how the processing for any new purpose is considered compatible with the original purpose, please our data privacy manager.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which we believe allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

Disclosures of your personal data

We may have to share your personal data with parties, as previously mentioned, and noted again here as follows; OSCR, Disclosure Scotland, and HM Revenue & Customs (generally only employees/workers). Our relevant “processor” service providers are currently WebCollect and Mailchimp and they will also likely receive/host certain personal data.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow 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 purposes and in accordance with our instructions.

4. International transfers, automated decision making and data security

We do not generally transfer your personal data outside the European Economic Area (EEA). However, Mailchimp are a US based company so your email addresses are therefore sent outside the EEA, for the purpose of them administering the relevant e-mail/newsletter list. Mailchimp’s privacy policy can be found here; <https://mailchimp.com/legal/privacy/>.

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those volunteers, trustees or members who have a need to know. They will only process your personal data on instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so. WebCollect,

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also take data protection seriously and further information (including their privacy notice) can be obtained by following this link; <https://webcollect.org.uk/pub/security> .

We do not perform any automated decision making.

5. Data retention

How long will you use my personal data for?

We will only 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.

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.

Details of retention periods for different aspects of your personal data are available in our retention policy which you can request from our data privacy manager.

6. Your legal rights

Under certain circumstances, you have certain rights under data protection laws in relation to your personal data. If you wish to exercise any of the rights set out below, please contact our data privacy manager.

YOUR LEGAL RIGHTS

You have the right to:

Request access to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it. See further information below.

Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, 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.

Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms.

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You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.