



# EAST KILBRIDE SPORTS CLUB



Torrance House, Strathaven Road, East Kilbride G75 0QZ

Telephone: (01355) 236001

## PRIVACY POLICY: MEMBERS & SUPPLIERS

### Our pledge to you:

- ✓ Is to hold your data securely;
- ✓ To share your data only where we are legally obliged to or have a legitimate purpose in the case of employees/members or where you agree;
- ✓ To use your data to tailor the information we provide you and improve our services;
- ✓ To put you in control by allowing you to update, delete and access your data.

### 1. Who are we?

- This policy covers how East Kilbride Sports Club (EKSC) collects, uses, discloses, transfers and stores your data. It applies from 25 May 2018.
- EKSC is the umbrella organisation that facilitates the promotion and playing of sport for our sports sections (Cricket, Golf, Harriers, Rugby & Tennis) and provides facilities for our social members.
- Our website <http://calderglensportshub.co.uk/> provides information about our sporting and social activities. It has more details about who we are and what we do.
- This privacy policy covers how we handle data within EKSC that we collect from our members, suppliers and users of our website. There is a separate privacy policy for EKSC employees, available on our website [here](#) (insert hyperlink)

### 2. Who is responsible for data management?

EKSC'S data controller is the Secretary of the Sports Club. You can contact him/her by writing: to the email address: [secretary@eksportsclub.com](mailto:secretary@eksportsclub.com) or by post to the Secretary at East Kilbride Sports Club, Calderglen Country Park, Strathaven Road, East Kilbride G75 0QZ.

The data protection officer is our Club Administrator. You can contact the data protection officer by writing to him/her at the address above or by sending an email to [admin@eksportsclub.com](mailto:admin@eksportsclub.com)

If you have any questions about this Privacy Policy, please contact the data protection officer.

### 3. What does this policy cover?

This privacy policy tells you:

- The information we collect about you (personal or not);
- Who has access to the data;
- Our legal bases for processing your personal data;

- Where we store your data;
- To whom do we disclose your personal data;
- Use of our website & social media pages;
- Why we collect it;
- How long we store it;
- Services we use to communicate like social media
- Your rights and how you can see, update or delete your personal data;

#### 4. ***What personal information do we collect?***

Membership of EKSC is open to all the community, upon payment of the appropriate membership fee.

**Members:** we collect names, contact details, including email addresses and telephone numbers, spouse/partner details (if a family member), names and ages of children who are also family members, which sports section(s) members have joined and their category of membership.

Where appropriate, we also collect bank details and other information to allow us to process payments to EKSC e.g. membership payments, purchase of function tickets by card.

For **junior members** (6-17 years of age), we collect name, age, gender and address details – the address details include a telephone number in the rare event that we have, in an emergency, to contact a parent/guardian of any child whose parent is not a member of the EKSC.

For **day members**, we collect name, contact details, including email addresses and telephone numbers, spouse/partner details if both joining as day members, and names and ages of any children who are separately junior/intermediate members of EKSC and the sports section(s) that the children are members of.

Where appropriate, we also collect bank details and other information to allow us to process payments to EKSC e.g. membership payments, purchase of function tickets by card.

For **visitors**, we will ask you to sign our visitors book, providing your name and address and the reason for your visit.

For **suppliers/contractors**, we collect name, contact details, including an email address and telephone numbers, bank details and other appropriate information to allow us to process payment or acknowledgement of services you provide to EKSC.

*Special Categories of Personal Data* – EKSC currently does not process special categories of personal data or data relating to criminal records & offences, unless an employee or member voluntarily shares this data e.g. to allow us to assess reasonable adjustments EKSC should consider for anyone with a disability.

#### 5. ***Who has access to data?***

Your information will be shared in EKSC strictly on a need to know basis, with the EKSC Office Bearers (if appropriate to their roles), the Bar Manager, the Bar Convener and any other EKSC employees involved in processing member benefits or supplier payments.

*Membership/Visitor data* will be processed by the Membership Convener, but some or all data may be shared, if appropriate, with and processed by the EKSC Office Bearers, Bar Manager, Bar Convener and Bar Staff e.g. bar staff need to be able to check who is a member, age (in terms of licencing laws) and may ask members to verify their personal data to confirm an individual's membership before the provision of services.

## **6. What is the legal basis for processing your persona data?**

There are potentially six lawful bases for processing data under the new data protection legislation. The main ones that apply to EKSC are:

1. *Contract* – processing is necessary for a contract we have with the individual, or because they have asked us to take specific steps before entering in to a contract;
2. *Legal Obligation* – processing is necessary for EKSC to comply with the law (not including contractual obligation);
3. *Legitimate Interests* – processing is necessary for EKSC's legitimate interests or the legitimate interest of a third party unless there is a good reason to protect the individual's personal data which overrides those legitimate interests.
4. *Consent* – the individual has given EKSC clear consent to process their data for a specific purpose.

It is possible that more than one legal basis applies to the processing of some data. Annex A sets out a summary of the EKSC legal bases.

## **7. Where do we hold your data?**

Data about members is held on EKSC's membership database, till system, in our cloud storage, in emails and spreadsheets on the laptops of the EKSC Membership Convener, the Office Bearers and employees, when appropriate to their roles, and occasionally on paper.

Data about suppliers is held on our EKSC computer, till system, in our cloud storage, in emails and spreadsheets on the laptops of the EKSC Office Bearers and the Membership Convener and our employees only when appropriate to their roles, and on paper e.g. in the form of contracts, invoices etc. It is also held by our third-party provider, Joseph McNally Limited, one of whose staff acts as EKSC Treasurer and processes payments to suppliers and other parties, manages supplier contracts etc.

## **8. To whom do we disclose your data?**

Membership data is collected by each sports section and shared with the EKSC Membership Convener. Relevant data is only shared with Office Holders and EKSC employees where such data is essential to the conduct of their duties e.g. processing member benefits, analysing membership statistics, communicating about membership issues, considering member complaints or enquiries, processing membership cards, credit or debit cards, cheques etc when a member is buying or paying for a service e.g. drinks at the bar, a deposit for a function booking, topping up a Bar Credit or paying for membership direct to EKSC.

Data may also be shared, where relevant, with the EKSC accountant, suppliers e.g. resolving issues with the till software.

We may share membership data e.g. total number of members by gender, age group, sporting section etc with other organisations e.g. South Lanarkshire Council, grant bodies such as Sportscotland, Virador Environmental Credits, Windfarms etc in response to surveys or when seeking financial grants for the improvement of EKSC facilities. Such information is only provided anonymously. Should more detailed information be requested, we would seek the consent of the Committee of the appropriate sports section before releasing any data.

#### **9. For how long do we keep data?**

EKSC stores your data on a secure database for the minimum period necessary. Membership data will be held for the duration of your membership and deleted within a maximum of 15 months after you paid your last membership fee, or within one month if you advise EKSC in writing that you will not be renewing your membership for the forthcoming year.

The specific maximum (we may hold data for shorter periods) retention periods for the data we collect is set out in Annex B of this policy.

#### **10. When you use our website**

We use cookies, website log files and digital analytics (Google) to gather information about how people use our website ([www.calderglensportshub.com](http://www.calderglensportshub.com)).

EKSC's website may place a "cookie" in your browser file. The cookie allows EKSC to provide certain information to you and to store information while you are using our website. You can read our [cookie policy](#).

We do not collect or store your personal information (e.g. your name or address) in our website analytics. However, we can recognise that behaviours belong to a single person. The information collected helps us investigate whether each website meets its users' needs as well as to assess how our website can be improved. We store information about what pages you visit, how long you are on the site, how you got here and what you clicked on.

If you have any concerns about the information which might be accessed from or stored on your device by EKSC, you may wish to only access EKSC content through a web browser and review your web browser settings.

#### **11. When you provide personal data?**

##### *Complaints*

When you make a complaint to us, you can do so by email, telephone, letter or visiting the Sports Club. The complaint will be passed initially to the Secretary (unless the complaint is about the Secretary, when it will be directed to the President) who will log it and acknowledge receipt.

A complaint can be made anonymously but if you want a reply, we will need your full name, address and/or email address. We will only use the personal information we collect to process

the complaint and to check on the level of service we provide. We will compile and share statistics about the number of complaints we receive at Annual General Meetings, but not in a form which identifies anyone.

By giving us your personal data as part of a complaint, you consent to us processing it. We retain personal data obtained from complaints for a maximum of **one year** and then confidentially destroy it.

#### *Request information*

You can request information, either by email or post. To do this, we need your email address and /or name and postal address. Our legal basis for processing is contract and we will retain data **two months** after the request.

#### *Request e-newsletters*

We use e-newsletters to keep members informed about major developments, including sporting and social events at the Sports Club and across the sports sections, important changes in our operational arrangements e.g. opening hours, key contacts or general meetings etc, and occasional competitions.

To provide these e-newsletters, we request your name and email address.

We only collect this data when we have your consent and retain it on a secure database. We store this data for **15 months** after your last communication with us, unless you withdraw consent. If you withdraw consent it will be deleted within **a month**.

#### *Give us feedback (unprompted)*

You do not need to include your name or contact details in order to provide us with general feedback or information about any technical problems on our website. You will, however, need to include an email address if you want us to reply to you. For some enquiries, contact details will be required.

We will only use any personal information provided to deal with your request and will not share it with other organisations. This data is stored for **two months** after we respond to your feedback, in case you ask for more detail or have other feedback you'd like to make.

We reserve, however, the right to use non-personal information for business, research and marketing purposes. Uses include:

- An internal report listing technical problems on the website and solutions
- Marketing literature using quotes drawn from feedback about the site

Our legal basis for processing this data is legal obligation.

#### *Give us feedback (when we ask you)*

We may ask you for feedback whilst on the website. You only need to include an email address if you want us to reply to you or you would like to be included in future research.

By giving us your personal data, you consent to us processing it. We will store it securely for a maximum of **6 months**.

We may share this data with a research organisation if they conduct the research on our behalf – they will destroy the personal data when the research is complete.

## 12. ***When you use other services, like Facebook, to interact with us***

When you use a social media platform, details about how your personal information is held, is described within the relevant social media policy, such as Facebook or Twitter.

## 13. ***When you contact us directly***

### *When you phone us*

We do not collect caller line identification information when you call us. We will only collect personal information that you consent to provide to us in order to deliver a service.

### *When you email us*

When you contact us via email, we will retain your email and our response to it for as long as the business issue remains. After this, the information will be confidentially destroyed.

### *When you write to us*

When you contact us via post, we will retain your letter/postal address/personal information and our response to it for as long as the business issue remains. After this, the information will be confidentially destroyed.

## 14. ***When we meet in person***

### *At the sports club*

EKSC staff will collect personal information from you at the Sports Club which will help us to deliver a service, for example, to book our function room, or purchase a ticket. Once the business use has passed, we will destroy this data confidentially.

## 15. ***When we contact you***

### *Email*

We may email you regarding a contract or service or in response to a request, you have made. Your data will be stored for the purpose and time required to fulfil this.

We only send emails to you promoting the Sports Club's activities where we have your consent. However, if you subscribed to regular information via email before May 2018, you have not asked us to stop and you have engaged with the content recently we will continue to contact you. The legal basis for this is legitimate interest.

We store this in a secure database for **15 months** after your last communication with us, unless you withdraw consent. If you withdraw consent, we will delete your data within a **month**.

### *Post*

Very occasionally we send information by post. We only communicate with you by post where we have your prior consent, or there is a legitimate interest to contact you. Our legal basis for processing this data is consent and, where appropriate, legitimate interest.

We store this information for **one year** after consent has been withdrawn or we no longer believe it in your interest.

We do not normally use a third-party provider to send information by post. Should we do so, the third-party provider will store your personal data for **one year** after it has been sent.

## 16. ***Your rights***

Under the General Data Protection Regulations, you have rights as an individual which you can exercise in relation to the information we hold about you.

Read more about your individual rights on the [Information Commissioner's Office](#) website.

## 17. ***Access to personal information***

East Kilbride Sports Club tries to be as open as it can be in terms of giving people access to their personal information. Individuals can find out if we hold any personal information by making a 'right of access' request under the General Data Protection Regulations. If we do hold information about you, we will:

- Give you a description of it;
- Tell you why we are holding it;
- Tell you who it could be disclosed to; and
- Let you have a copy of the information in an intelligible form.

## 18. ***Links to other websites***

This privacy policy does not cover the links within our website linking to other websites. We encourage you to read the privacy statements on the other websites you visit.

## 19. ***Changes to this privacy policy***

We keep our privacy notice under regular review. This privacy notice was last updated on 20 May 2018.

Since this policy is under regular review, you may wish to check it each time you submit personal information. If you do not agree to these changes, please do not continue to use the Sports Club website to submit personal information. If material changes are made to the Privacy Policy, for instance affecting how we would like to use your personal information, we will provide a more prominent notice.

You can access this policy at any time through our website.

## 20. ***How to contact us***

East Kilbride Sports Club tries to meet the highest standards when collecting and using personal information. For this reason, we take any complaints we receive about this very

seriously. We encourage people to bring it to our attention if they think that our collection or use of information is unfair, misleading or inappropriate. We would also welcome any suggestions for improving our procedures.

This privacy notice was drafted with brevity and clarity in mind. It does not provide exhaustive detail of all aspects of our collection and use of personal information. However, we are happy to provide any additional information or explanation needed.

Any requests for this should be sent to the address below.

Email us [admin@eksportsclub.com](mailto:admin@eksportsclub.com)

Telephone: 01355 236001

Or write to:

The Club Administrator  
East Kilbride Sports Club  
Calderglen Country Park  
Strathaven Road  
East Kilbride  
G75 0QZ

**East Kilbride Sports Club**  
**20 May 2018**

**/Annexes**



## Summary of EKSC Legal Bases for Processing Data

Category of Personal Data	Purpose of Processing	Legal bases for Processing
Basic personal information & contact details of Members & external parties booking an event in EKSC	To allow EKSC to maintain accurate records & contact details of members & for business administration purposes	Necessary for legitimate business interests of EKSC - a Private Members Club. Necessary for compliance with legal obligation e.g. licencing laws.
Supplier/contractor details, including bank & other details	For business administration purposes, including fulfilment of contracts & for defence against potential legal claims	Necessary for the performance of a contract or to enter into a contract. Necessary for compliance with a legal obligation. Necessary for the legitimate interests of EKSC
Junior Members	To allow EKSC to maintain accurate records & contact details of members & for business administration purposes	Necessary for legitimate interests of EKSC
Day Members	To allow EKSC to maintain accurate records & contact details of members & for business administration purposes	Necessary for legitimate interests of EKSC
Visitors	For business administration purposes, including adhering to licencing requirements for Private Members Club	Necessary for legitimate interests of EKSC Necessary for compliance with a legal obligation.
Disciplinary & Grievance Records of Members	For business & HR administration purposes, including defence against potential legal claims	Necessary for the legitimate interests of EKSC
<b>When you contact EKSC:</b> Complaints (to EKSC), request e-newsletters, providing EKSC with feedback	For business administration purposes	Consent  Legitimate interest (where appropriate)
<b>When EKSC contacts you:</b> Emails, Post (including 3 <sup>rd</sup> party provider), e-Newsletters	For business administration purposes	Consent  Legitimate interest (where appropriate)

### Summary of EKSC Data Retention Periods

<i>Type of Data</i>	<i>How long held (maximum)?</i>
Membership information	15 months
Complaints	1 year
Requests for information	Two months after the request
Consent to receive e-newsletters	15 months after your last communication but, if you withdraw consent, one month
Function booking forms	Two months after the date of the function
Provision of feedback to EKSC (unprompted by EKSC)	Two months after we have responded to your feedback
Feedback (if invited by EKSC)	Six months
Forms on social media (do we have any?)	Three months
Emails initiated by you (unless withdrawing consent)	Until the business issue has been resolved (1 month if consent withdrawn)
Emails initiated by EKSC	15 months after your last communication but, if you withdraw consent, one month
Post	1 year
Post by Third Party provider	1 year
Supplier/contractor details (contact details, bank details etc)	Six months after completion of service, or six months after completion of contract unless contractual or statutory requirement to hold longer