

GDPR comes into effect on 25th May 2018 and affects any organization which holds personal data. This includes amateur clubs such as Scottish Ski Club and in consequence your Committee has approved the Privacy Notice set out below. Before we can finalise conformance with the new regulation, we need to ensure that the wording of our Privacy Notice fully covers all the personal data held within the Club, and that we have implemented the various processes and checks to fulfill the commitments implied by the Privacy Notice. In due course, we will have all this in place and at that time, the final Privacy Notice will be made available on the web-site.

Scottish Ski Club

General Data Protection Regulation: Privacy Notice, 23rd May 2018

New regulations protecting your personal data, and setting down new data protection rights, take effect from 25th May 2018. This notice 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 Committee 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. This data includes your name, address, phone number, email address, ("contact information"), your gender, date of birth, date of joining the Club, membership category and your banking details (if and when required).

If you are a competitor, we will hold data relevant to your participation in events and may share that data with Alpine Training Centre and Nevis Range (our suppliers of race training), or with Snowsports Scotland, or other event organizer (who may be a member of the Committee). This could include special category data relating to your health or disability, which will only be held with your consent. 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,

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 a slope, 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 Membership Secretary. In most circumstances, only authorised Club Committee members have access into this information.

SSC employs third party suppliers to provide services, such as printing and distribution. 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..

The Club will not pass your personal information onto any other third party without your consent.

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. All personal data held by the Membership Secretary is encrypted and password protected. Any paper records, e.g. Club membership application forms, are held in a locked cabinet, and key access is restricted to authorised officials.

In today's technological environment such data may be held "in the cloud", rather than Committee members' own computers, and such data may be held out with EEA (i.e. 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 timeframe 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 member's 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:-

- be informed regarding what data is being held, and why
- to have access to the data being held to verify accuracy
- to be able to rectify any errors in the data
- 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 these uses of data are not undertaken by the Club in respect of your personal data.

Whom do you contact for more information?

The Club takes actions aiming to ensure that member contact details are kept up to date, e.g. annual reminders to members, and we ask that members keep their personal information up to date, each year along with Subscriptions members are asked to update their details. 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 by email to the Membership Secretary at: membershipsecretary@scottishskiclub.org.uk

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 not appointed a formal Data Protection Officer to maintain ongoing review of our Club policies and practices in this important area, although the Committee 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 Committee is undertaking a review of our Club systems and processes, as they relate to members personal data, is putting in place procedures to ensure the proper use of the data for Club membership purposes only, and has will down review procedures in terms of assessing information securely.

On conclusion of this review, a copy of the formal Club GDPR Policy will be made available to members on the Club website, and members should note that any updates to the Club GDPR Policy will be published on the Club website.

If you have any queries and/or concerns regarding these matters, please contact Bill Aitken (Committee member with responsibility for GDPR matters) on w.aitken@blueyonder.co.uk