

23 April 2018

## THE NEW CLUB PRIVACY POLICY

**1. Introduction.** The New Club is Scotland's oldest private Members' Club. The purpose of the Club is the association of Members for social reasons.

**2. Data Protection Registration.** The New Club is registered (registration reference ZA297870) with the Information Commissioner's Office.

**3. Data Controller.** The New Club is the Data Controller. The New Club has appointed the position of Club Secretary to take responsibility for data protection matters. His details are:

Col A P W Campbell  
Secretary, The New Club  
86 Princes Street, Edinburgh, EH2 2BB

Telephone: 0131 226 4881

Email: secretary@newclub.co.uk

**4. Data Subjects.** The Data Subjects are candidates for membership, members of the Club, former members and staff members.

**5. Collecting Personal Information.** The Club may collect, store and use the following kinds of personal information:

- a. Personal data, but not sensitive personal data, on data subjects. This includes: names; addresses; job titles; email addresses; telephone numbers (mobile, phone and office); dates of birth; gender; marital status; and NI number (for staff).
- b. Details of data subjects bank accounts will be retained in order that subscriptions can be taken when authorised and staff can be paid.
- c. Information about data subjects' computers and about their or other third party visits to and use of the Club's website (including IP address, geographical location, browser type and version, operating system, referral source, length of visit, page views and website navigation paths).
- d. Information that data subjects provide to the Club for the purpose of subscribing to the Club's email notifications and/or newsletters and/or events (including data subjects' name and email address).
- e. Information that data subjects provide to the Club when using the services on the Club's website, or that is generated in the course of the use of those services (including the timing, frequency and pattern of service use)
- f. Photographs either provided by the data subject or available on open sources, to enable identification.
- g. Any other personal information that data subjects choose to send the Club.
- h. Information pertaining to any complaint about a data subject relevant to his or her membership or use of the Club, or about any guest of a data subject or member of a reciprocal club relevant to his or her use of the Club.

**6. Processing and Using Personal Data:**

- a. The New Club complies with its data protection obligations by keeping personal data up to date; by storing and destroying it securely; by not collecting or retaining excessive amounts of data; by protecting personal data from loss, misuse, unauthorised access and disclosure and by ensuring that appropriate technical measures are in place to protect personal data.
- b. The New Club uses the information it collects about data subjects:
  - (1) To process membership applications.
  - (2) To make contact about subscription renewals.
  - (3) To administer membership.
  - (4) To process membership fees.
  - (5) To keep data subjects informed of Club activities.
  - (6) To assist in security protection.
  - (7) To identify data subjects.
  - (8) To ensure the efficient administration of all staff members, including paying their wages and salaries.

**7. Legal basis for processing information.** The New Club collects personal data that is necessary for the purpose of its *legitimate interests* as a membership organisation.

**8. Sharing Information.** Personal data will not be shared with any other organisations or to third parties unless there is a legal requirement to do so.

**9. Retention of Personal Data.** When a data subject resigns, their personal data will be retained in order that:

- a. Should they wish to re-enlist, the details of the circumstances of their resignation are known.
- b. Should their widow, widower or partner wish to join the Club there is evidence of membership.

**10. Data Subjects' Rights.** Unless an exemption applies, data subjects have the following rights with respect to their information:

- a. To request a copy of the personal information which we hold about you. There is no fee for this service.
- b. To request that the Club corrects information is believed to be incorrect or incomplete.
- c. To request that personal information is deleted where it is no longer necessary for the Club to hold it.
- d. To request a restriction on further processing where there is a dispute in relation to the accuracy or processing of a data subject's personal information.

- e. To object to the processing of a data subject's personal information.
- f. To withdraw a data subject's consent for processing at any time, where consent was requested by the New Club to process your personal information.

The Data Controller should be contacted to request any of the information above.

**11. Internet Privacy.** The Club uses a web analytics tool to analyse site usage, how users arrive at the New Club site, what is done on the site, what browser is being used and on what operating system etc. However, this analytics data, collected via a JavaScript tag in the pages of our site, is not tied to personally identifiable information.

**12. Security.** The Club will take reasonable technical and organisational precautions to prevent the loss, misuse and alteration of personal data. Additionally:

- a. CCTV. The Club has installed for the purposes of member and staff protection, crime prevention and crime detection, a CCTV system. This system is not for general viewing and any requests to view footage must be made to the Data Controller and will only be granted if the purpose is legal. Footage of the CCTV system is held for 28 days and then is automatically deleted. A separate document on CCTV policy is extant.
- b. The Club will ensure procedures for ensuring the security of all electronic personal data. Paper records containing personal data will be retained securely and will be disposed of in a secure way when no longer required. Documentation detailing personal data and staff records are kept in locked filing cabinets. IT equipment containing personal data is kept in a locked room or cupboard when not in use, all within the Club building.
- c. All passwords protecting personal data held electronically by the Club should contain upper and lower-case letters, a number, a symbol and be at least 7 characters in length.

**13. Cookies.** A number of different cookies are used on the website. If data subjects do not know what cookies are, or how to control or delete them, then we recommend they visit <http://www.aboutcookies.org> for detailed guidance.

**14. Implied Consent.** The following information describes the cookies that are used on the website and what they are used for. Currently an 'implied consent' policy is applied which means that it is assumed you are happy with this usage. If you are not happy, then you should either not use this site, or you should delete our cookies having visited the site, or you should browse the site using your browser's anonymous usage setting (called "Incognito" in Chrome, "InPrivate" for Internet Explorer, "Private Browsing" in Firefox and Safari etc.)

**15. Session Cookies.** If applicable, the Club may use a session cookie to remember your log-in for you. These the Club deems strictly necessary to the working of the website. If these are disabled then various functionality on the site will be broken. More information on session cookies and what they are used for at <http://www.allaboutcookies.org/cookies/session-cookies-used-for.html>

**16. Persistent Cookies for Site Analytics and Performance.** Google Analytics - we use this to understand how the site is being used in order to improve the user experience. User data is all anonymous. You can find out more about Google's position on privacy as regards its analytics service at <http://www.google.com/analytics/learn/privacy.html>

**17. Social Buttons.** Data Subjects may see on pages of the site 'social buttons'. These enable users to share or bookmark the web pages. There are buttons for: Twitter, Google +1, Facebook 'Like', LinkedIn 'Share', and StumbleUpon. In order to implement these buttons, and connect them to the relevant social networks and external sites, there are scripts from domains outside of The New Club. You should be aware that these sites are likely to be collecting information about what you are doing all around the internet, including on our site. So, if you click on any of these buttons, these sites will be registering that

action and may use that information. In some cases, these sites will be registering the fact that you are visiting this site, and the specific pages you are on, even if you don't click on the button if you are logged into their services, like Google and Facebook. You should check the respective policies of each of these sites to see how exactly they use your information and to find out how to opt out, or delete, such information.

**18. Questions.** If you have any questions about privacy, please contact the Data Controller.

**19. Personal Data Breach.** "Personal data breach" means a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to personal data transmitted, stored or otherwise processed.

**20. Data Controller: Legal Duty.** There is a legal duty on the Data Controller to report to the Information Commissioner's Office (ICO) within 72 hours of the occurrence of a personal data breach. Data breaches must be reported where they present a risk to the rights and freedoms of the data subject. Examples would include loss or disclosure of personal data due to computer hacking, or the theft of staff or membership records. Anyone who becomes aware or suspects that a data incident has occurred must immediately inform the Club Secretary. The Club Secretary will determine if a breach needs to be reported.

**21. Changes to this Privacy Notice.** This privacy notice is regularly reviewed and may be updated from time to time. When it is updated an updated version will be placed on the website and, if the changes are significant, the Club Secretary will try his best to bring it to your attention.

**22. Contact information and Further Advice.** If any data subject has any questions about this privacy notice, the information that is held about the data subject or the way it is used, they should contact the Club Secretary.

**23. Complaints.** The Club will try to resolve any complaint about how your personal data is used but if you are not satisfied with our response you have the right to lodge a complaint with the Information Commissioner's Office whose contact details are as follows:

Information Commissioner's Office  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF  
Telephone – 0303 123 1113 (Local Rate) or 01625 545 745  
Website – <https://ico.org.uk/concerns>

**24. Approval.** This policy was approved by the New Club Managers' Committee, Edinburgh on Monday 23 April 2018 and is subject to amendment and alteration at any time.

Signed:



Victoria Peterkin  
Chairman