**Privacy notice for [Club Name]**

**[Club Name] takes your privacy seriously. We are a “controller” of the personal information that you provide to us and this privacy notice sets out how, why and for how long we will use your personal data, as well as who it is shared with. It also explains your legal rights as a data subject and how to exercise them.**

**What we need from you**

When you register as a member of [Club Name] or renew your membership (including if you are registering or renewing on behalf of a young person aged 16 or under), we may ask you for some or all of the following personal information: [Examples provided in bullet points below, delete or add as appropriate]

* Contact details – eg. name, address, email address and phone number.
* Date of birth – to calculate membership category and eligibility for events and courses.
* Payment details – bank account number, sort code, card details.
* Participation details – other clubs, existing Mountaineering Scotland membership number.
* Equality information – sex, gender, disability, ethnic group and religion.
* Safety and emergency details – eg. next of kin, relevant health conditions.
* [Add anything else you ask for – delete as appropriate]

If you do not provide us with all of the personal information that we need this may affect our ability to offer you our membership services and benefits.

**Why we need your personal information – contractual purposes**

We need to collect our members’ and customers’ personal information so that we can manage your relationship with us. We may use our members’ personal information to: [Examples provided in bullet points below, delete or add as appropriate]

* Provide you with core member services, including confirmation of membership, membership card, end of year renewal.
* Set up an online membership account enabling you to manage your membership and communication preferences.
* Organise club activities and manage risk and safety if you attend a meet on the hill or at a climbing wall.
* Register your membership with the representative body, Mountaineering Scotland, to provide you with insurance cover, magazine subscription and other benefits they offer to members of clubs, including access to courses and competitions.

**Why we need your personal information – legitimate purposes**

We also process our members’ personal information in pursuit of our legitimate interests to: [Examples provided in bullet points below, delete or add as appropriate]

* Provide you with news and updates about the activity of the club, opportunities to get involved in club meets, training, general meetings or other events.
* Raise awareness of the club’s activities by capturing photos, videos, or live streaming at events. We will use this for promotion, education and development purposes.
* Respond to and investigate your questions, comments, support needs, complaints, concerns or allegations.

**Why we need your personal information – legal obligations**

We are under a legal obligation to process certain personal information relating to our members for the purposes of complying with obligations under:

* The Protection of Vulnerable Groups (Scotland) Act 2007, which 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.
* [Clubs which are also charities, delete if not applicable] The Charities and Trustees Investment (Scotland) Act 2005, which requires us to maintain a register of members, including name, address, date admitted to membership and date on which membership ceased, to hold general meetings, issue notices and AGM voting arrangements.

**Why we need your personal information – equality monitoring [delete this purpose if not applicable to your club]**

We use aggregated and anonymised reports of our members’ personal information for equality monitoring purposes, enabling us to evaluate and promote equality of opportunity within our sport.

**Other uses of your personal information**

We may ask you if we can process your personal information for other purposes. Where we do so, we will provide you with an additional privacy notice explaining how we will use your information for these purposes.

**Who we share your personal information with**

When we register your membership with Mountaineering Scotland we pass on your personal data and Mountaineering Scotland become a controller of your personal data. Mountaineering Scotland provides full details of how it uses your personal data in its own privacy notice ([www.mountaineering.scot/privacy-notice](http://www.mountaineering.scot/privacy-notice)) and will not use it for any other purpose.

We may be required to share personal information with statutory or regulatory authorities to comply with statutory obligations. Such organisations include the Health & Safety Executive, Disclosure Scotland, and Police Scotland for the purposes of safeguarding children, and [UK Anti-Doping for the purpose of eliminating doping in sport – delete if the club is not involved in competition climbing]. We may also share personal information with professional and legal advisors for the purpose of obtaining advice.

**Third party suppliers with access to members’ personal data**

The [Club Name] may use third party suppliers to provide services. These suppliers may process personal data on our behalf as “processors” and are subject to contractual conditions to only process that personal information under our instructions and protect it.

In the event that we share personal information with external third parties, we only share such information strictly required for the specific purposes and take reasonable steps to ensure recipients shall only process the disclosed personal information in accordance with those purposes. [Examples provided in bullet points below, delete or add as appropriate]

* Azolve Ltd. provide our membership database.
* [Bank Name] process payment transactions securely on our behalf.
* Mailchimp distribute some of our email communications. Their servers are based in the US and they uphold the EU Privacy Shield to certify their data security.
* Instructors, coaches and event organisers receive details of training or competition participants.

**How we protect your personal information**

Your personal information is accessed by our [Membership Secretary, Secretary, Treasurer – delete or add as appropriate] only for the purposes set out above. It is stored by our club in [one or two sentences to explain how you store members’ personal data in paper or electronic records, and what security measures you put in place, eg. password protected documents, locked filing cabinets]. Your personal data is transferred to Mountaineering Scotland by inputting it directly into a password-protected database or emailed via a password-protected spreadsheet.

**How long we keep your personal information**

We only keep your personal information for as long as necessary to provide you with membership services. Unless you ask us not to, we will review and delete your personal information where you have not renewed your membership with us for [insert number] years.

**You have a right to:**

* Change your communication preferences or restrict the processing of your personal data for specific purposes.
* Request that we correct your personal data if you believe it is inaccurate or incomplete.
* Request that we delete your personal information.
* Access the personal data that we hold about you through a “subject access request”.

You can contact us at [give contact details and instructions for how someone can get in touch].

If you are dissatisfied, you have a right to raise a complaint with the Information Commissioner’s Office at [www.ico.org.uk](http://www.ico.org.uk)