# EDINBURGH JMCS PRIVACY POLICY

The Edinburgh JMCS is a 'controller' of the personal information you have provided to us. This privacy policy 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 information we collect

We record the following personal information:

- your name, address, telephone number(s), e-mail address;
- the date on which you joined the club.
- whether or not you are a member of another club affiliated to Mountaineering Scotland, and if so which club.

### Why we collect this information

We collect this information for the purpose of managing your relationship with us. We use members' personal information to:

- provide core member services including confirmation of membership and end of year renewal;
- distribute information to members via a google email group;
- provide members with news and updates about the activity of the club, opportunities to get involved in club meets, training, general meetings or other events;
- provide or administer activities for members, such as club meets;
- register membership with Mountaineering Scotland, which is the national representative body for climbing and mountaineering. This provides members with various benefits, as described on the club website.

Under the General Data Protection Regulation (GDPR), the legal basis for the JMCS collecting and processing this information is to achieve our legitimate interests as a mountaineering club. In relation to the provision of information to Mountaineering Scotland, the processing is also carried out to comply with our contractual obligations to provide member information as an affiliated club.

#### How we hold your information

The personal information described above is stored in a password-protected spreadsheet accessible only to the Club Secretary, Treasurer and Hut Custodians.

#### How long we keep your personal information

Your personal information is retained for the duration of membership of the club. If your membership lapses you can ask us to delete your information immediately, otherwise it will be deleted at the end of the club financial year following the final year for which you paid a subscription.

## Access to your information and updating it

You have the right to request a copy of the information that the club holds about you. To make such a request, please contact the Club Secretary (email: secretary@edinburghjmcs.org.uk). We also wish to make sure that information about members is accurate and up to date. You can update your information directly via a form on the club website or by notifying the Club Secretary.

#### Who we share your personal information with

We use the organisations listed below to provide some services. These organisations 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. We only share the 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.

- **Mountaineering Scotland**. When we register your membership with Mountaineering Scotland we pass on your personal data, and Mountaineering Scotland then becomes a controller of your personal data. Mountaineering Scotland provides full details of how it uses such data in its own privacy notice and will not use it for any other purpose.
- **Google group email lists.** We use these email lists to send out general information to members. Only members' email addresses are registered with these groups. Google complies with the GDPR, see the Google privacy notice.
- The club membership list may be sent to hut custodians of 'kindred' clubs for the purpose of verifying that JMCS members are entitled to book their huts, under 'reciprocal rights' arrangements with these clubs. The current kindred clubs are:
  - The Fell and Rock Club
  - The Scottish Mountaineering Club
  - The Yorshire Ramblers' Club

Each of these clubs have GDPR privacy policies, but they are keeping them private (links to them are inside the clubs' membership-only areas of their web sites).

## Complaints

If at any point you have a complaint about how we have handled your personal data, you can contact the Club Secretary who will investigate the matter. If you are not satisfied with our response you can have the right to complain to the Information Commissioner's Office (ICO) at: www.ico.org.uk