



The Cairngorm Club - Privacy Notice

The Cairngorm Club 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.



When you register as a member of The Cairngorm Club or renew your membership, we may ask you for some or all of the following personal information:

- Contact details – e.g. name, address, email address and phone number.
- Payment details – bank account number & sort code.
- Participation details – other clubs, existing Mountaineering Scotland membership number.
- Safety and emergency details – eg. next of kin, relevant health conditions.

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:

- Provide you with core member services, including confirmation of membership, membership card, end of year renewal.
- Organise club activities.
- 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:

- 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 Equality Act 2010, which requires us to process personal information to make reasonable adjustments where necessary.
- 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.

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) 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 may include the Health & Safety Executive, Disclosure Scotland, and Police Scotland. 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 Cairngorm Club 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.

- Azolve Ltd. provide the Mountaineering Scotland membership database.
- RBS and Moorepay process payment transactions securely on our behalf.
- Hostgator distribute some of our email communications and provide our web hosting services. Their servers are based in the US and they uphold the EU Privacy Shield to certify their data security.
- EmailOctopus (trading as Three Hearts Digital Ltd) distribute some of our email communications. They are registered with the ICO. Their servers in Amazon's data centre in Ireland closely comply with all current EU data protection laws.
- Instructors, coaches and event organisers receive details of participants.

How we protect your personal information

Your personal information is accessed by our Secretary, Treasurer & Membership Secretary, committee members, and meet organisers for the purposes set out above. It is stored by the Treasurer & Membership Secretary on a stand-alone, password protected computer, and is transferred to others by email as a password protected computer file. Your personal data is transferred to Mountaineering Scotland by inputting it directly into a password-protected database or emailed via a password-protected spreadsheet.

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 via email at treasurer@cairngormclub.org.uk

If you are dissatisfied, you have a right to raise a complaint with the Information Commissioner's Office at www.ico.org.uk