Midlothian Dog Training Club GDPR Privacy Policy

1. Introduction

- 1.1. MIDLOTHIAN DOG TRAINING CLUB Is committed to protecting the personal information and privacy of all members, trainers, examiners, and other individuals who participate in or facilitate Club services and events.
- 1.2. This Privacy Notice sets out the basis on which any personal data that we collect or that is provided to us will be processed by us.
- 1.3. For the purpose of the General Data Protection Regulation [the GDPR], the data controller is MIDLOTHIAN DOG TRAINING CLUB.
- 1.4. We may update this Privacy Notice from time to time. Please check back regularly to see any updates or changes to this Notice.

2. Data Protection Contact

2.1.1. Our Club Secretary can be contacted with any data protection queries at reply@mdtc.co.uk.

3. Data Protection Principles

We will comply with data protection law. This says that the personal information we hold about all individuals must be:

- 1. Used lawfully, fairly and in a transparent way.
- 2. Collected only for valid purposes that we have clearly explained and not used in any way that is incompatible with those purposes.
- 3. Relevant to the purposes we have stated and limited only to those purposes.
- 4. Accurate and kept up to date.
- 5. Kept only as long as necessary for the purposes we have stated.
- 6. Kept securely.

4. Particulars of processing

4.1. We process personal data about members, judges, other officials, and exhibitors at our events. The categories of individuals whose personal data we process are described in more detail in the Annex to this Privacy Notice.

5. Your rights as a data subject

5.1. The General Data Protection Regulation provides the following rights (subject to some exemptions):

- 5.1.1. The right to request access to the personal data that we hold about you;
- 5.1.2. The right to request rectification of the personal data that we hold about you;
- 5.1.3. The right to request erasure of the personal data that we hold about you;
- 5.1.4. The right to request restriction of processing about you;
- 5.1.5. The right to object to processing; and
- 5.1.6. The right to data portability.

If you wish to raise a complaint on how we have handled your personal data, you can contact our Club Secretary at the details above.

If you are not satisfied with our response or believe we are processing your personal data not in accordance with the law you can complain to the Information Commissioner's Office (ICO) full contact details for which can be found at https://ico.org.uk/global/contact-us/

6. How we will use information about you

We will only use your personal information when the law allows us to. Most commonly, we will use your personal information in the following circumstances:

- 1. Where we need to perform the contract we have entered into with you.
- 2. Where we need to comply with a legal obligation.
- 3. Where it is necessary for our legitimate interests, or those of a third party, and your interests and fundamental rights do not override those interests.

We may also use your personal information in the following situations, which are likely to be rare:

- 1. Where we need to protect your interests or someone else's interests.
- 2. Where it is needed in the public interest or for official purposes.
- 6.1 We will generally process your personal data for contractual necessity in providing membership services and events. We may also use personal information for additional relevant and related purposes where you might reasonably expect us to do so, where the benefits of doing so are not outweighed by your own interests or fundamental rights or freedoms. This may include:
 - 6.1.1. To maintain our records and other administrative purposes, including updating your details and preferences:
 - 6.1.2. To assist with queries, complaints, and dispute resolution.
 - 6.1.3. For communications related to membership and invitations to participate in canine market research or canine health studies:
 - 6.1.4. To assist with upholding our Club constitution and acting in cases where there may be a breach of the Club Rules.

- We will ask for your direct consent if we intend to use your personal data for marketing purposes. Where our processing of personal data is based on your having given consent, you have the right as a data subject to withdraw that consent at any time. If you wish to invoke this right, please notify the Club Secretary using the details set out in Section 2 above.
- You have the right to lodge a complaint with a supervisory authority. In the United Kingdom, the supervisory authority is the Office of the Information Commissioner, full contact details for which can be found at https://ico.org.uk/global/contact-us/

7. Recipients of Data

- 7.1. We may use service providers such as Coacha to help us provide you with our services. Personal data may be transferred to such service provider, who act for or on our behalf, for further processing in accordance with the purpose(s) for which the data was originally collected or may otherwise be lawfully processed.
- 7.2. Such third parties have contracted with us as data processors under the requirements in the GDPR. They are contractually bound to only use personal data for the agreed purpose(s). Relevant persons working for these third parties will have access to your personal data under the terms of the data processor contract, but only to the extent necessary to perform their services for us.
- 7.3. These data processors agree to implement reasonable contractual and technical protections, to keep your data confidential, not sell your personal data to third parties and to not disclose your personal data to third parties except as may be required by law, as permitted by us or as stated in this Privacy Policy.
- 7.4. These data processors may transfer data to third parties such as Stripe, Mailchimp to perform further data processing services.
- 7.5. In appropriate circumstances we may disclose data to authorised bodies as required by law.

8. Visitors to Midlothian Dog Training Club website – Cookie Policy

- 8.1. We may use cookies to monitor how people use our website.
- 8.2. We will collect these cookies under Legitimate Interests in order to provide you with our online services and to analyse visitor behaviour on our website.
- 8.3. Cookie information is held on your browser and you can amend your browser settings at any time. However, please be aware that blocking or deleting all cookies will affect the usability of our website.
- 8.4. Please contact our Club Secretary for further information on data we collect through our website and how you can block and delete cookies.

9. Contact details

9.1. Please contact the Club Secretary if you have any questions or concerns about personal data and privacy matters.

ANNEX

This Annex sets out the Midlothian Dog Training Club's processing of personal data relating to members (including committee members), trainers, examiners, judges, other officials, and exhibitors at our events.

What personal data do we process, why do we process it and what is the lawful basis?

Members

- Name
- Address
- Date of Birth
- Next of Kin/Emergency Contact
- Email address
- Telephone number
- Medical details you want us to be aware of.
- Pet details (where appropriate)
- Photographic images

We process your personal data for the following purposes:

[Purpose]

- Provision of membership services including administration and transactional communications relating to membership
- Upholding the Society Rules
- Compliance with Kennel Club Rules and Regulations
- Publication of members' names and photographic images on the Club website
- Contacting you regarding invitations and information about Club events/meetings, etc.
- Publication of personal details on the Club website (Committee Members only
- Special Category Data includes medical details about you, such as whether they have any allergies or any special medical conditions or access requirements. If you join our Club, we may collect Special Category Data about you. We will tell you where this is the case, and this information will never be collected without your consent being obtained by us.
- We will only use Special Category Data:
- provided we have your explicit consent to use it, or in the case of nominated users, your team leader or organiser has obtained your explicit consent to their and our using it.
- where we believe that we need to use that data to protect your vital interests where you are not able to provide us with your explicit consent.
- where you have previously made that data public knowledge.
- if we need to use that data to establish, exercise or defend legal claims; or
- where there is some other legal basis that allows us to use that information.

[Lawful basis]

Contractual Necessity

Contractual Necessity

Contractual Necessity

Legitimate interests

Legitimate Interests

Consent

Legitimate Interests

Trainers, judges, examiners & other officials

[List personal data processed e.g.:]

- Name
- Address
- Date of Birth
- Next of Kin/Emergency Contact
- Email address
- Telephone number
- Photographic images
- Relevant qualifications

We process your personal data for the following purposes:

[Purpose]		[Lawful basis]
•	Administration and transactional communications relating to judging appointments	Contractual Necessity
•	Upholding the Club Rules	Contractual Necessity
•	Compliance with Kennel Club Rules and Regulations (including sharing relevant required information)	Contractual Necessity
•	Publication in the Club's judges' list and for appointments in the show/event schedules	Legitimate Interests
•	Publication of the judges' names and photographic images on the Club website	Legitimate Interests

Exhibitors/Competitors

- Name
- Address
- Email address
- Telephone number
- Pet details
- Relevant qualifications

We process your personal data for the following purposes:

•••	or occas your personal data for the following purposes.	
[Purpose]		[Lawful basis]
•	Administration and transactional communications for exhibitors/competitors entering our events	Contractual Necessity
•	Provision of services relating to our events	Contractual Necessity
•	Upholding the Club Rules	Contractual Necessity
•	Compliance with Kennel Club Rules and Regulations	Contractual Necessity
•	Contacting you regarding future events	Legitimate Interests
•	Publication of your name, address and pet information in our event catalogue [subject to the right to object]	Legitimate Interests
•	Publication of event results and photographic images on our Club website and relevant community websites, e.g. Obedience UK	Legitimate Interests

We also process personal data for the Club's legitimate interests as we have outlined in the main Privacy Notice (paragraph 6.1). Please be assured that we will always take account of your personal data rights in doing so.

Where do we obtain your personal data from?

Most of the above personal data is received direct from you (the data subject). However, information may be received from third parties.

How long do we hold your personal data for?

Personal data will be retained in accordance with statutory requirements, Kennel Club requirements and recommendations and the Club's retention policy which is available on request.

Are you obliged to provide us with your personal data?

You are not obliged to provide the personal data in question. However, if you do not provide the personal data, we will be unable to perform any contract we have with you for the provision of membership services, judging appointments or event services.

Kennel Club records

The Kennel Club will hold the personal data of the Club committee members as a part of the implementation of Kennel Club Rules and Regulations.

We also provide the Kennel Club with the details of Challenge Certificate winners at our events to meet requirements in the Kennel Club Rules and Regulations.

We provide show entrants' data to our show printer for inclusion in the show catalogue.

Do we use your data for any automated decision-making?

No personal data is processed for automated decision-making

Any financial data arising from a transactional process will be held securely by Midlothian Dog Training Club in accordance and compliance with all statutory and HMRC requirements.