

Privacy Policy for the website:
Updated: February 2024

1. Terms of Use and Privacy Policy

This Privacy Policy governs the manner in which St Andrew's Club collects, uses, maintains and discloses information collected from users (each, a "User") of the <https://www.standrewsclub.com> website ("Site"). This privacy policy applies to the Site and all products and services offered by St Andrew's Club, through the Site.

2. Personal Data collected

2.1 the types of personal data that are collected

If signing up to the 'Join Us' membership part of the Site, Users will be asked for name, email address, mailing address, phone number, date of birth, medical conditions, allergies, emergency contact, additional information requested to help us with our funding applications, anonymised for analysis (detailed in 4.1 below).

If signing up to 'Newsletter' part of the Site, Users will be asked for name, email address, mailing address.

The Site does not store any payment card details, as these are all handled directly by PayPal. Here is their privacy notice:

<https://www.paypal.com/uk/webapps/mpp/ua/privacy-full>

Users can always refuse to supply personal identification information, although this may then prevent them from engaging in certain Site related activities.

We may collect personal data which indirectly identifies Users, whenever they interact with our Site. The personal data may include the browser name, the type of computer and technical information about Users' means of connection to our Site, such as the operating system and the Internet service providers utilized and other similar information.

2.2 how/when this data is collected

We may collect personal data from Users in a variety of ways, including, but not limited to, when Users visit our Site, create, use or manage an account on our Site, subscribe to the newsletter and in connection with other activities, services, features or resources we may make available on our Site.

3. Web browser cookies

Our Site uses "cookies" to enhance User experience. A cookie is a small file of letters and numbers which is put on your computer or mobile device when you access a website. Cookies are widely used in order to make websites or mobile applications work more effectively, as well as to store information about your preferences or past actions. Users' consent will be required for cookies to be enabled and Users can refuse to provide this consent. Users' web browsers place cookies on their hard drive for record-keeping purposes and sometimes to track information about them. Users may choose to set their

web browser to refuse cookies, or to alert you when cookies are being sent. If they do so, note that some parts of the Site may not function properly.

3.1 We use the following types of cookies

- 'Session cookies' which exist only while your browser is open. These are deleted automatically once you close your browser.
- 'Persistent cookies' which survive after your browser is closed. They can be used by the Site to recognise your computer or mobile device when you open your browser and browse the internet again.

3.2 What cookies do we place on our Site?

Cookie Name	Purpose	Expiry
Member_d :	This cookie is used to maintain the logged in session of the User whenever they log into the website. Data collected directly from Users on our Optimiser Site falls under Article 13 of UK GDPR. See point 4.1 below.	Session cookie

3.2 What Third Party cookies are used on our Site?

- Our Site contains links to other sites that are not operated by us. If you click a third-party link, you will be directed to that third party's site. We strongly advise you to review the Privacy Policy of every site you visit.
- We have no control over and assume no responsibility for the content, privacy policies or practices of any third-party sites or services.

Cookie Name	Purpose	Expiry
Google Analytics Cookie (_ga) :	This cookie is used to maintain Google Analytics, a <u>web analytics</u> service that tracks and reports traffic to our website. Google Analytics collects and stores cookies in order to identify the User's browser or device. These cookies provide information about how visitors use our Site, which we can then use to compile reports and to help us improve our service. Google classifies the cookies and data collected as confidential information so they are passed to St Andrew's Club anonymously. The data we use to improve our services includes the number of visitors to the site, general location of visitors such as city, where visitors have come to the site from, the pages they visited and the duration of the session. Please see <u>https://policies.google.com/technologies/partner-sites</u>	Third Party. Persistent. Lasts for 2 years

	for more information about how Google stores and uses your data. Data obtained from Google Analytics falls under Article 14 of UK GDPR. See point 4.2 below.	
guest_id	Twitter cookie. This cookie is set by Twitter to identify and track the website visitor. Please see https://help.twitter.com/en/rules-and-policies/twitter-cookies for Twitter's cookie policy. Data obtained from Twitter falls under Article 14 of UK GDPR. See point 4.2 below.	Third Party. Persistent. Lasts for 2 years
personalization_id	Twitter cookie. Carries out information about how the end user uses the website and any advertising that the end user may have seen before visiting the said website. Please see https://help.twitter.com/en/rules-and-policies/twitter-cookies for Twitter's cookie policy. Data obtained from Twitter falls under Article 14 of UK GDPR. See point 4.2 below.	Third Party. Persistent. Lasts for 1 year
various	Some YouTube videos are embedded in our Site. A YouTube cookie is used to provide web analytics in terms of the number of times a video has been watched and/or shared. For further information, read YouTube's privacy policy: https://www.google.com/policies/privacy/ .	Third Party. Various.

4. How we use collected information?

4.1 processing under Article 13 UK GDPR (i.e. in relation to personal data collected directly from Users)

If a User creates an account on our Site, we will process the following information to manage the account, using the Optimiser database function to ensure:

- payment is up-to-date
- any medical/ allergy conditions are noted/ observed
- Users receive the communications they have opted into from the following:
 - Club Programme Updates – email/ text message/ post
 - Occasional short Club survey – email/ text message/ post
 - Chronicle e-newsletter up to 6 times per year – email
 - Chronicle printed newsletter up to 3 times per year – post
 - Occasional impact reports/fundraising appeals – email/ post
 - Occasional event invitations – email/ post
- Additional information requested to help us with our funding applications, is anonymised for analysis:
 - Learning Difficulties
 - Other Disability

- Accommodation Status – choose from a selection
 - Ethnic group – choose from a selection
 - Education Status (if applicable)
 - Training
 - Name of School/College/University
 - Religion – choose from a selection
- If a User signs up to our mailing list, using the Optimiser mailing function – communications will be sent out according to the preferences selected:
 - Chronicle e-newsletter up to 6 times per year – email
 - Chronicle printed newsletter up to 3 times per year – post
 - Occasional impact reports/fundraising appeals – email/ post
 - Occasional event invitations – email/ post
- If at any time the User would like to unsubscribe from receiving future comms, we include detailed unsubscribe instructions at the bottom of each email/ text message or the User may contact us via our Site.

4.2 processing under Article 14 UK GDPR (i.e. in relation to personal data collected from third parties).

St Andrew's Club may collect and use Users' personal data, which is passed to St Andrew's Club anonymously, for the following purposes:

- To provide information about how visitors use our Site, which we can then use to compile reports and to help us improve our service.

5. How we protect your information

We comply with UK GDPR data collection, storage and processing practices and security measures to protect against unauthorised access, alteration, disclosure or destruction of your personal data, including your username, password, transaction information and other data stored on our Site.

6. Sharing your personal information

We do not sell, trade, or rent Users' personal data to others. Our website, database and mail marketing function is hosted by Optimiser, which will not transfer European Data to any country or recipient not recognized as providing an adequate level of protection for Personal Data (within the meaning of applicable European Data Protection Laws), unless it first takes all such measures as are necessary to ensure the transfer is in compliance with applicable European Data Protection Laws. Such measures may include (without limitation) transferring such data to a recipient that is covered by a suitable framework or other legally adequate transfer mechanism recognized by the relevant authorities or courts as providing an adequate level of protection for Personal Data, to a recipient that has achieved binding corporate rules authorization in accordance with European Data Protection Laws, or to a recipient that has executed appropriate standard contractual

clauses in each case as adopted or approved in accordance with applicable European Data Protection Laws.

We may use third party service providers to help us operate our business and the Site or administer activities on our behalf, such as sending out surveys. We may share your personal data with these third parties for those limited purposes provided that you have given us your permission.

7. Disclosure Of Data – Legal Requirements

St Andrew's Club may disclose your Personal Data in the good faith belief that such action is necessary to:

- To comply with a legal obligation
- To protect and defend the rights or property of St Andrew's Club
- To prevent or investigate possible wrongdoing in connection with the Service
- To protect the personal safety of users of the Service or the public
- To protect against legal liability

As a European citizen, under GDPR, you have certain individual rights. You can learn more about these in the [ICO GDPR Guide](#)

8. Third-party websites

Our Service may contain links to other sites that are not operated by us. If you click a third-party link, you will be directed to that third party's site. We strongly advise you to review the Privacy Policy of every site you visit.

We have no control over and assume no responsibility for the content, privacy policies or practices of any third-party sites or services.

9. Changes to this Privacy Policy

We may update our Privacy Policy from time to time. We will notify you of any changes by posting the new Privacy Policy on this page.

We will let you know via email and/or a prominent notice on our Service, prior to the change becoming effective and update the "effective date" at the top of this Privacy Policy.

You are advised to review this Privacy Policy periodically for any changes. Changes to this Privacy Policy are effective when they are posted on this page.

10. Find out more/ Contact Us

You can find out more about cookies on the [Know Cookies website](#).

St Andrew's Club is registered with Information Commissioner's Office Reference No: Z9131236. Their contact details are: <https://ico.org.uk/global/contact-us/>

St Andrew's Club Data Protection Officer is Sarah Nicholls, CEO

[Contact us](#) if you have any other questions.