



SWAFFHAM GOLF CLUB WEBSITE PRIVACY POLICY

Introduction

Welcome to the Swaffham Golf Club's privacy notice. Swaffham Golf Club shall be referred to as the "**Club**", "**we**", "**us**", "**our**" throughout this privacy notice.

The Club respects your privacy and is committed to protecting your personal data. This privacy notice will inform you as to how we collect, use, handle and disclose your personal data, as well as tell you about your privacy rights and how the law protects you. If you need any more information about our data protection practices, please contact us using the details below.

This privacy notice deals with the matters set out below. Please also use the Glossary to understand the meaning of some of the terms used in this privacy notice.

1. **Important information and who we are**
2. **Data protection principles**
3. **The data we collect about you**
4. **How your personal data is collected and used**
5. **Disclosures of your personal data**
6. **International transfers**
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9. **Your legal rights**
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1. **Important information and who we are**

Purpose of this privacy notice

This privacy notice aims to give you information on how we collect and process your personal data, including any personal data you may provide when signing-up as a member of the Club, booking a tee time as a non-member player, purchasing products from the Club shop, entering into a competition, or that you provide through your use of this website, including any data you may provide when you submit a request for us to contact you. Please see the Glossary section for an explanation of the meaning of "**personal data**".

This website is not intended for children and we do not knowingly collect data relating to children, other than in relation to children who enter into junior competitions.

It is important that you read this privacy notice together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you, so that you are fully aware of how and why we are using your data. This privacy notice supplements the other notices and is not intended to override them.

Controller

The Club is the controller and responsible for your personal data.

We have appointed a data compliance manager who is responsible for overseeing questions in relation to this privacy notice. If you have any questions about this privacy notice, including any requests to exercise your legal rights (see paragraph 9 below), please contact the data compliance manager using the details set out below.

Contact details

Name of data compliance manager: Current Chairman

Email address: chairman@swaffhamgc.co.uk

Postal address: Swaffham Golf Club, Cley Road, Swaffham, PE37 8AE

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

Changes to the privacy notice and your duty to inform us of changes

This version was last updated on 28.5.18

We reserve the right to change this privacy notice from time to time, so please check back regularly to obtain the latest copy. We will notify you of the changes to this privacy notice.¹

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

Third-party links

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

2. Data protection principles

The Club adheres to the principles set out in data protection legislation when handling personal data. These principles require personal data to be:

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- (a) Processed lawfully, fairly and in a transparent manner.
- (b) Collected only for specified, explicit and legitimate purposes.
- (c) Adequate, relevant and limited to what is necessary in relation to the purposes for which it is processed.
- (d) Accurate and where necessary kept up to date.
- (e) Not kept in a form which permits identification of data subjects for longer than is necessary for the purposes for which the data is processed.
- (f) Processed in a manner that ensures its security using appropriate technical and organisational measures to protect against unauthorised or unlawful processing and against accidental loss, destruction or damage.
- (g) Not transferred to another country without appropriate safeguards being in place.
- (h) Made available to data subjects and allow data subjects to exercise certain rights in relation to their personal data.

We are also responsible and accountable for ensuring that we can demonstrate compliance with the data protection principles listed above.

3. The data we collect about you

We may collect, use, store and transfer different kinds of personal data about you. The personal data that we collect and process will broadly fall into the following categories:

- Personal data collected and processed in relation to your membership;
- Personal data collected and processed in relation to any tee bookings;
- Personal data collected and processed in relation to products purchased at the Club shop;
- Personal data collected and processed through the website.

We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does **not** directly or indirectly reveal your identity. For example, we may aggregate data about usage of the website to calculate the percentage of users accessing a specific website feature. Likewise, we may aggregate data that we collect through entering individuals into competitions in order to produce certain reports. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy notice.

We do not collect any **Sensitive Personal Data** about you (as defined in the Glossary) through the website. We may occasionally collect Sensitive Personal Data through direct interaction with you (for example, information about any medical conditions or dietary requirements that we may require in connection with a competition or tournament), and in these circumstances we will ensure that we obtain explicit consent from you to process this Sensitive Personal Data, or where appropriate, rely on another lawful basis for processing Sensitive Personal Data under data protection laws. We do not collect any information about criminal convictions and offences.

If you fail to provide personal data

Where we need to collect personal data by law, or under the terms of a contract we have with you (for example, where we need your personal data to administer your membership) and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you.

4. How is your personal data collected and used?²

The below provides a summary of how we collect and process your personal data:

Types of data	Collection	How and why we process your data	Lawful basis for processing
Contact details of member	Collected personally or online	Administering your membership, providing information about the Club, taking payment of subscription fee	Performance of a contract with you
Contact details of a Non member or visitor	Collected personally or online	Administering your visit in respect of tee times and catering arrangements	Performance of a contract with you
Contact details of a member, non member or visitor	Collected personally or online	Marketing purposes	Where explicit consent has been given by you
Answering queries	Collected personally or online	Records of contact with us	Legitimate reason in case there are any issues with your visit or membership
Retention of personal data	Collected personally or online	Retrospective contact required where we may have a legal obligation to do so	May be required in relation to complaints or queries.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details

about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Generally we do not rely on consent as a legal basis for processing your personal data other than in relation to sending direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by contacting us.

See below to find out more about the types of lawful basis that we will rely on to process your personal data.

Promotional offers from us

You will receive marketing communications from us if you have requested information from us or if you provided us with your details when you entering into a transaction with us and, in each case, you have not opted out of receiving that marketing.³

Third-party marketing

We will get your express opt-in consent before we share your personal data with any company outside the Club for marketing purposes.

Opting out

You can ask us or third parties to stop sending you marketing messages by contacting us at any time.

Where you opt out of receiving these marketing messages, this will not apply to personal data that we need to collect or process in relation to services that we are providing, or have provided, to you.

Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

5. Disclosures of your personal data

We may have to share your personal data with the parties set out below for the purposes set out in the table in paragraph 4 above.

- External Third Parties as set out in the Glossary.
- If a change happens to our organisation, then the new owners may use your personal data in the same way as set out in this privacy notice.
- Any specific third parties with whom personal data is shared

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

6. International transfers

7. We do not transfer your personal data outside the European Economic Area (EEA).⁴Data security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

8. Data retention

How long will you use my personal data for?

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

Details of retention periods for different aspects of your personal data are available on request by contacting us.

9. Your legal rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data (as set out in more detail below), including the right to:

- Request access to your personal data.
- Request correction of your personal data.
- Request erasure of your personal data.
- Object to processing of your personal data.
- Request restriction of processing your personal data.
- Request transfer of your personal data.
- Right to withdraw consent.

If you wish to exercise any of the rights set out above, please contact us.

⁴ See Drafting Note 15.

No fee usually required

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

10. Glossary

Personal data, or **personal information**, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

Sensitive Personal Data means information revealing racial or ethnic origin, political opinions, religious or similar beliefs, trade union membership, physical or mental health conditions, sexual life, sexual orientation, biometric or genetic data, and personal relating to criminal offences and convictions.

LAWFUL BASIS

Legitimate interest means the interest of our organisation in conducting and managing our organisation to enable us to give you the best service and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us

Performance of contract means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

Comply with a legal or regulatory obligation means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

THIRD PARTIES

External Third Parties

- Service providers who provide IT, software and system administration services. This includes any providers of golf handicap software.
- Professional advisers acting as processors or joint controllers including lawyers, bankers, auditors and insurers who provide consultancy, banking, legal, insurance and accounting services.
- HM Revenue & Customs, regulators and other authorities acting as processors or joint controllers based in the United Kingdom who require reporting of processing activities in certain circumstances.

YOUR LEGAL RIGHTS

You have the right to:

Request access to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you

withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.