



Minchinhampton Golf Club

Privacy Policy

Introduction

Minchinhampton Golf Club (MGC) values the trust placed in it by Members, employees, visitors, and suppliers/contractors, who provide their personal data. Data security is one of the Club's highest priorities and the Club therefore aims to be as clear and open as possible about what we do with personal data and why.

Personal privacy is important, and MGC is committed to the privacy of all its users. Records will be designed, used and stored so as to assure privacy. Legislative controls over data and records will be adhered to, as set out in the Data Protection Act 2018 (DPA) and the General Data Protection Regulations (GDPR).

Policy

The Privacy Policy sets out the responsibilities of Minchinhampton Golf Club's Board about ensuring personal privacy regulations are adhered to and implemented in a practical manner.

The scope covers personal information and data that might be held by the Club in relation to its Members, employees, contractors and visitors/customers.

Procedures

Personal information is collected lawfully and used for specific reasons. The sections below outline what information is collected and how it is used.

For Members

- Name
- Physical Location Address (Postal Address)
- Contact information, including email address and telephone numbers
- Emergency contact details
- Date of Birth

- Gender
- Subscription payment details
- Handicap
- Medical status for buggy privileges
- A parental / guardian consent form for any junior applications

How is it used:

The information collected via the membership application process is to enable the Club to understand Members’ needs and provide them with a better service and, in particular, for the following reasons:

- Internal record keeping
- To improve products and services offered by the Club
- To deliver periodically Club news, important Club-related changes, and information about events and offers. These are usually sent to the Members’ email address – for this purpose it is necessary that Members agree to “opt in” otherwise this information may not reach them
- From time to time, the Club may also use the personal details to send surveys
- To use the information to customise the website according to Members’ interests

Contact may be made by email, phone, fax, mail or via specific apps (eg Junior Team App), depending on the Member’s preference.

When a Member joins MGC, they agree to “opt in” but have the right to unsubscribe (“opt out”) at any time. By unsubscribing a member will remain a Club Member, but may not receive any further Club news or information.

Any personal data will only be used internally and never shared with third parties, with the exception of Handicaps with England Golf.

A Member’s account will be lapsed when they leave, and all banking details will be deleted. Intelligent Golf does not allow for other data to be deleted.

For Visiting Golfers

- Name
- Contact details including email and mobile number
- CDH number
- Medical status for buggy privileges
- A parental / guardian consent form for any junior applications

How is it used:

The Club requires this information for the following reasons:

The information collected is to enable the Club to understand Visiting Golfers’ needs and provide them with a better service and, in particular, for the following reasons:

- For golf bookings, competitions and entry to Opens made online

- Internal record keeping
- To improve products and services offered by the Club
- To provide information about events and offers. These are usually sent to the Golfers' email address. Visitors are given the opportunity to opt in and may opt out at any time.
- From time to time, the Club may also use the personal details to send follow-up surveys

Contact may be made by email, phone or mail depending on the need.

Any personal data will only be used internally and never shared with third parties, with the exception of Handicaps with England Golf.

Where visitors are contacted with information about services and offers, the Club will ensure that this is in compliance with the GDPR.

Visitor information will be kept indefinitely unless a request is received to remove it.

For Contractors and Service Providers

- Name
- Contact information including phone numbers, email address and physical/postal address
- Other information relevant to a booking/service/contract
- Other information relevant to work being undertaken
- Bank details

How is it used:

The Club requires this information for the following reasons:

- To understand what is needed and to provide a better service when arranging a contractor or service provider visit
- Internal record keeping
- For payment of any invoices

Where contacted, the Club will ensure that this is in compliance with the GDPR.

Any personal data will only be used internally and never shared with third parties.

Contractor and Service Provider information will be kept indefinitely unless a request is received to remove it.

For Employees

- Name
- Contact information including phone numbers, email address and physical/postal address
- Where appropriate, qualifications and CV information
- HR and relevant recruitment information

- Bank details
- Driving licence details
- Next of kin

How it is used:

The Club requires this information for the following reasons:

- Internal record keeping
- Making payments to the employee
- Contact in the event of an emergency
- To comply with insurance and DVLA requirements when driving company vehicles, including buggies

Data will be removed from the Club's records within 6 years of leaving the service of the Club.

Individual Rights

The Club adheres to the rights of individuals as introduced by the GDPR, in addition to modifications covered in the Data Protection Act (DPA) 2018.

Under GDPR, individuals may request details of personal information held by the Club.

To request a copy of the information held on them, individuals should send an email to the Data Protection Officer: General Manager

CCTV

MGC uses CCTV to capture images of individuals or information relating to individuals' actions for Health & Safety and crime prevention purposes.

Data is processed fairly and lawfully. For more information, please refer to the Clubs' CCTV Policy.

Data Security

MGC is committed to ensuring that information is secure. In order to prevent unauthorised access or disclosure, the Club has put in place suitable physical, electronic and managerial procedures to safeguard and secure the information collected online.

The Club will not store personal information for any longer than it needs to, however it may be obliged by law to store communications and personal information, including activity logs, and it may need to show details of these to government or authorised officials upon request.

All electronic member information is stored off site on an encrypted cloud storage platform. Any information that may exist on internal systems, including members'/customers' emails,

are protected by passwords, a firewall and kept on computers in a locked office. All physical member information is stored in secure locked filing cabinets in a locked office.

Links to other websites

The Club's websites may contain links to other websites of interest. However, once a user has used these links to leave the Club websites, it should be noted that the Club does not have any control over the other website. Therefore, the Club cannot be responsible for the protection and privacy of any information that a user provides whilst visiting other sites, and such sites are not governed by this Privacy Policy.

Users should generally exercise caution and look at the Privacy Statement applicable to any 3rd party website in question.

Controlling personal information

Members, visitors, employees and other users have a right to have their personal data erased to prevent processing in the following specific circumstances:

- Where the personal data is no longer necessary in relation to the purposes for which it was originally collected/processed
- If a user withdraws consent for the Club to hold the data
- If a user objects to the processing and there is no overriding legitimate interest for continuing the processing
- The data was unlawfully processed in accordance with the GDPR
- The personal data has to be erased in order to comply with a legal obligation

Users may choose to restrict the collection or use of personal information in the following ways:

- When asked to fill in a form on the website it is recommended that a user looks for the box that allows the indication that the user does not want the information asked for to be used by anybody for direct marketing purposes
- If a user has previously agreed to Minchinhampton Golf Club using their personal information for direct marketing purposes (opted in), the user may change their mind at any time by writing to or emailing the Club's General Manager.

The Club will not sell, distribute or lease personal information to third parties unless specific permission is granted, or it is required by law to do so.

The Club may use personal information to send promotional material about third parties, which it is thought would be of interest, if this is what members, visitors, employees confirm they wish to have happen.

If it is believed that any personal information the Club is holding is incorrect or incomplete, then members, visitors or employees can write to or email the Club as soon as possible to the General Manager. The Club will promptly amend any information found to be incorrect.

Every effort is made to secure private data across all areas in which data is stored, in the unlikely event of a data breach, this will be reported to any persons impacted and/or affected parties, in compliance with the regulations.

Guidance

Guidance has been sought from England Golf but in particular from the Information Commissioner's Office (ICO) focused on the Data Protection Act 2018, implementing the General Data Protection Regulations (GDPR).

If you have any concerns about our use of your personal information, you can make a complaint to us by emailing the General Manager for data protection queries.

Complaints & Disciplinary

The Club will follow the procedures of England Golf, adopting detailed procedures in sympathy with Club circumstances at the time of any complaint. Please see England Golf regulations for detailed guidance.

To ensure consistent application of every disciplinary issue, from any Section of the Club or the membership, any complaint must be in writing and placed before the General Manager in the first instance. A record will be kept for each written instance reported.

The General Manager acts as the Club Compliance Department and will investigate the complaint either to resolve matters or to refer it to the Vice Chairman of the Board for further consideration. See MGC's Disciplinary Policy for more details.

You can also complain to the ICO if you are unhappy with how we have used your data.

The ICO's address:

Information Commissioner's Office

Wycliffe House

Water Lane

Wilmslow

Cheshire

SK9 5AF

Helpline number: 0303 123 1113. ICO website: <https://www.ico.org.uk>

Version Control:

Version	Risk Committee review date	Board endorsement date	Changes
V1		June 2017	
V2.0	12/01/2022		Annual Review
V2.0		31/01/2022	Board Approval – no changes
V2.1	Aug 2023	Sept 2023	Annual review
V3.0			Published Oct 2023