



## HOLME HALL GOLF CLUB DATA PRIVACY NOTICE

Here at Holme Hall Golf Club (“the Club”) we take your privacy seriously and will only use your personal information to administer your account and to provide the products and services you have requested from us. In order for us to do so we comply with the Data Protection Act (already in place) and the General Data Protection Regulations coming into force on 25 May 2018. This Privacy Notice provides you with the following information:

1. Identity and contact details of the Data Controller
2. Purposes and legal basis
3. If ‘legitimate interests’ are used what these are
4. Recipients or categories of recipients
5. Cross border transfers and on what basis (adequacy finding, suitable safeguards etc.)
6. Retention period or criteria applied
7. Individuals’ rights under GDPR
8. Whether a statutory or contractual requirement
9. Existence of automated decision making and logic involved

### **1. Identity and contact details of the Data Controller**

- 1.1. Whilst the Club is not obliged to nominate a specific Data Controller due to the relatively small scale of its operations, the Club takes its responsibilities seriously with regards to GDPR. As such, the Club Committee is collectively responsible for the tasks of a Data Controller where appropriate. The Data Controller is the person who (either alone or jointly or in common with other persons) determines the purposes for which and the manner in which any personal data are, or are to be, processed.
- 1.2. The Club Data Privacy Notice is reviewed in January each year.
- 1.3. Breaches or suspected breaches of the Club Data Privacy or Club Information Security Policy should be reported immediately to the Data Controller.
- 1.4. Holme Hall Golf Club is located at Holme Lane, Bottesford, Scunthorpe, DN16 3RF. Any contact regarding Data Privacy should be made to the Manager using email address [manager@holmehallgolf.co.uk](mailto:manager@holmehallgolf.co.uk) or in writing to the above address.

### **2. Purposes and legal basis**

Data is collected and used by the Club in order to:

- 2.1. Provide members and visitors with the services expected of membership of Holme Hall Golf Club, or those of a visitor to Holme Hall Golf Club including but not limited to open competitions or the provision of services provided by the club including function room hire. These are: access to the golf Club and premises, provision of a Club handicap where appropriate, provision of news



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- and information relating to the Club, competitions and golfing news that the Club feels would be of reasonable interest to its members, provision of security access to Club members, provision of a Club membership and bar card, accounting for membership and other commercially related activity,
- 2.2. Communicate to members by email, post, social media, text or telephone.
  - 2.3. The legal basis on which this data is required for processing is contractual. The Club seeks freely given, specific, informed and unambiguous consent from members. The Club seeks the same consent from visitors for the provision of information relating to the potential provision of services that they have specifically requested.

### **3. Legitimate Interests**

The Club seeks to process information on the basis of legitimate interests for the following:

- 3.1. Registering members and employees details on our systems
- 3.2. Registration of members' details to operate their membership of the club (name, address, telephone, email, emergency contact, parental contact where appropriate)
- 3.3. Contracts
- 3.4. Reviews of employee performance
- 3.5. Personal details of volunteers where appropriate
- 3.6. Reviews of supplier performance
- 3.7. Operation of Club private and open competitions
- 3.8. Collection of video recordings via CCTV
- 3.9. The taking of photographs that are related to club competitions (for both member only competitions and open competitions)
- 3.10. The member information that we collect will include the name, address, telephone number, email address and social media address of members supplier contacts and employees. Personal data collected may be used by the Club and third party organisations for the administration of the club, the key systems concerned are:
  - 3.10.1. ClubV1 - for membership administration and member loyalty card administration (3).
  - 3.10.2. BRS - for tee bookings (3).
  - 3.10.3. Sage Payroll - for employee payroll processing (L).
  - 3.10.4. Volunteer database - if you are a volunteer (whether specifically for the Club, or if you are helping us for other reasons - for example you work for another organisation which is running an event with us) then we may collect extra information about you (e.g. references, criminal records checks, details of emergency contacts, medical conditions etc.). This information will be retained for legal reasons, to protect us



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(including in the event of an insurance or legal claim) and for safeguarding purposes (L).

- 3.10.5. Sage Accounts where we may collect Supplier and Customer contact details (name, telephone and email addresses) (L).
- 3.10.6. These systems may be changed from time to time as deemed appropriate by the club, for example we may change our payroll or accounting or membership system.

### Notes:

(L) indicates systems data is collected locally and held locally

(3) indicates systems data is collected locally but held remotely on third party systems. Where data is held remotely on third party systems, the Club has sought assurances under its obligations of GDPR that all data is processed in accordance with GDPR regulations.

## **4. Recipients or categories of recipients**

### 4.1. Recipients of data include:

- 4.1.1. Club members
- 4.1.2. Prospective Club members
- 4.1.3. Suppliers' contacts
- 4.1.4. Customers' contacts
- 4.1.5. Employees
- 4.1.6. Government bodies where we are required to provide data under law e.g. HMRC
- 4.1.7. Prospective members, suppliers, customers and employees
- 4.1.8. External organisations where appropriate e.g. event organisers

## **5. Cross border transfers and on what basis**

- 5.1. The Club confirms that it does not transfer data outside of the EU on systems physically operated at the Club.
- 5.2. The Club has sought assurances from its providers of third party systems that data is not transferred outside of the UK and awaits the providers' confirmations. These systems are:
  - 5.2.1. ClubV1 - for membership
  - 5.2.2. BRS - for tee time bookings

## **6. Retention period or criteria applied**

- 6.1. The Club retains personal data for the period of members' active memberships up to but not exceeding 12 months following a member leaving the Club. This is in order to ensure any that appropriate matters regarding



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membership are concluded, such as return of locker keys, return of security gate key fobs and members cancelling their decision to leave the Club. These retention timescales are also applied to the other recipients or categories of data shown in section 4 above. In certain circumstances, the Club may be required to retain data for longer than this i.e. legal purposes.

- 6.2. CCTV video data is overwritten in line with our policy of CCTV images being overwritten after 2 - 4 weeks. Please note that for the security of members, their property and staff safety the Club operates a CCTV system. Copies of current CCTV footage are available to members upon written request.

### **7. Individuals' rights under GDPR**

7.1. Individuals have the following rights under this Data Privacy Notice:

- 7.1.1. The right of access. A written request may be made by an individual to the Manager of the Club and the Club shall within 1 month providing them with the following information:
- 7.1.1.1. A description of the personal data and the purposes for which it is being processed, recipients, retention period and rights of rectification, erasure, restriction and objects
  - 7.1.1.2. The existence of any automated decision making.
  - 7.1.1.3. Transfer safeguards
  - 7.1.1.4. A copy of the data and details of the source of the data (where this is available). Please note that a fee may be chargeable to cover administrative costs where the request is manifestly unfounded, excessive or repetitive.
- 7.1.2. Rectification. An individual has the right to have inaccurate data rectified without undue delay.
- 7.1.3. Erasure. An individual has the 'right to be forgotten' and their personal data deleted in certain circumstances.
- 7.1.4. Restriction of processing. An individual has the right to obtain a restriction of processing when:
- 7.1.4.1. accuracy is contested
  - 7.1.4.2. processing is unlawful but an individual opposes deletion and requests restriction instead
  - 7.1.4.3. data is no longer needed by the Club's Data Controller but an individual requires it for establishment, exercise or defence of legal claims
  - 7.1.4.4. pending a right to an object action.
- 7.1.5. Data Portability
- 7.1.5.1. individuals have the right to obtain a copy of their personal data from the the Club data controller is a commonly used



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format and have it transferred to another data controller. The Club will make such data available in .txt or .csv file formats.

- 7.1.6. Object to Processing. An individual has the right to object to processing on the basis of their particular situation, or their wish not to be subject to direct marketing.
- 7.1.7. Individuals have the right to object to significant decisions, including profiling, made solely by automated means. Exceptions to this are where the profiling is required in order to perform the contract entered into by the individual, where it is authorised by Union or Member State Law, or by an individual's express consent.
- 7.1.8. Compensation. Individuals have a right to compensation for damages caused by infringement of the Regulation from the Data Controller or Data Processor.

### **8. Whether a statutory or contractual requirement**

- 8.1. This Privacy Notice is in place based on our need to:
  - 8.1.1. Enter into a contract with you as a Member of the Club in order to provide you with Club services.
  - 8.1.2. Provide you with information prior to you becoming a member of the Club.
  - 8.1.3. Provide you with information as a visitor to the club and its services.
  - 8.1.4. Provide you with services as an employee or prospective employee of the Club.
  - 8.1.5. Provide you with information as a contact at a supplier or customer of the Club.
  - 8.1.6. Record details of Volunteers where appropriate

### **9. Existence of automated decision making and logic involved**

- 9.1. The Club does not make use of automated decision making tools in the provision of its services.