

## **DISS GOLF CLUB**

### **DATA PROTECTION AND PRIVACY POLICY**

#### **INTRODUCTION**

The General Data Protection Regulations (GDPR) protect individuals against the misuse of personal data and may cover both manual and electronic records.

Information on the GDPR can be found at [www.ico.org.uk](http://www.ico.org.uk), the website of the Information Commissioner's Office.

All records held electronically or physically fall within scope of the Regulations.

The Regulations require that any personal data held should:

- a) be fairly and lawfully processed;
- b) be processed for limited purposes and not in any manner incompatible with those purposes;
- c) be adequate, relevant and not excessive;
- d) be accurate;
- e) not be kept for longer than is necessary;
- f) be processed in accordance with individuals' rights;
- g) be secure; and
- h) not be transferred to other countries without adequate protection.

The Regulations also give individuals certain rights over personal data held:

- a) the right to be informed;
- b) the right of access;
- c) the right to rectification;
- d) the right to erasure;
- e) the right to restrict processing;
- f) the right to data portability;
- g) the right to object;
- h) the right not to be subject to automated decision-making including profiling.

#### **POLICY**

Diss Golf Club (DGC) holds personal data about members, staff and visitors. The only data DGC will hold will be:

- a) Members - information necessary to execute the contract of membership and that required to pursue the legitimate purposes of the club and of club membership;
- b) Staff - information necessary to execute the contract of employment;
- c) Visitors - contact details, if consent is given, to enable future marketing contact by DGC.

A privacy notice will be provided separately to all members and staff which sets out what information DGC holds and why, how it is used, and who it is shared with. If an individual's personal information changes, the individual should let the DGC Office know at the earliest opportunity so that the DGC records can be up-dated.

DGC will not share personal data with any external party except as stated below, and will not use personal data other than for the purposes of the Club.

DGC will use its best endeavours to ensure that personal data is held securely, whether electronically or physically, in accordance with the GDPR.

DGC will not hold personal data longer than is necessary to meet the requirements of club membership or staff employment.

### **Members**

The personal data that has been collected about members will be kept and used for the following purposes:

- a. maintaining individual membership of the club, including communications relating to the payment of subscriptions;
- b. bank details only if required for payment of subscriptions by direct debit, if this method is chosen by the member;
- c. maintaining records within DGC and with CONGU for the administration of golf handicaps;
- d. communicating about club golfing and social events;
- e. (only if required) recording medical certificates relating to buggy use in club competitions; and
- f. (only if required) safeguarding purposes.

DGC considers that the following personal data falls within the categories a) to d) above:

- a) personal details, including name, address, email and telephone contacts, DOB and handicap;
- b) bank details, if the member has elected to pay by direct debit;
- c) details of member's bar card to maintain the card payment system; and
- d) records of any disciplinary action arising from the Club's Rules.

Such data may be held on file or on the club's IT management system (provided by Club Systems, whose system is GDPR compliant).

Data relating to e) and f) above will be subject to separate and specific consent when required.

DGC will periodically review the nature of the information being collected and held to ensure there is a sound business reason for requiring the information to be retained.

Subject to such review, information collected will be retained throughout the individual's membership of the club. After termination or lapse of membership, the information will be securely destroyed within 1 year, saving only name and date of termination of membership.

The individual member has the right to request that their personal data is deleted; such requests will be dealt with by the General Manager or the Accounts Administrator, who will review the request and take appropriate steps. However, a request to delete core membership data may lead to loss of membership.

### **Staff**

The personal data related to staff members will be required for the following purposes:

- a) recruitment and training;
- b) administration and payment of wages;
- c) calculation of benefits (such as pensions) and administration of taxes and other charges;
- d) disciplinary or performance management issues;
- e) performance review;
- f) recording of communications with employees;
- g) compliance with legislation and regulation;
- h) provision of references; and
- i) staffing levels.

The following employee information may be held by DGC to meet these needs:

- a) personal details, including name, address, DOB, status and qualifications;
- b) references and CVs;

- c) emergency contact details;
- d) notes on discussions between management and employee;
- e) appraisals and documents relating to grievance, discipline, promotion/demotion or termination of employment;
- f) training records;
- g) salary, benefits and bank/building society details; and
- h) sickness records.
- i) (if required) DBS certification.

Staff personal data will be held as long as required by regulation.

Other personal data on employees will only be held by DGC if required from time to time to meet legal obligations.

### **Visitors**

Other than necessary details for payment for services provided by DGC, the only information sought from visitors will be contact details, and such details will only be held and used if specific consent is given by the visitor concerned. Such contact details will only be used by DGC for future marketing purposes of the club, and will not be passed, sold or exchanged with external organisations. Visitors will have the right to ask that their contact details be deleted.

### **USE OF PERSONAL DATA**

To ensure compliance with the Regulations and in the interests of privacy, the disclosure and use of information held by DGC is governed by the following conditions:

- a. personal data must only be used for one or more of the purposes specified in this Policy;
- b. DGC documents may only be used in accordance with the statement within each document stating its intended use;
- c. member contact details may be shared with Club Organisers (such as the Handicap Committee, competition and match organisers, social event organisers and the Club Professional), so that such Organisers can fulfil the Objects of DGC in arranging golf and social matters;
- d. member name, age, handicap and golf playing records will be shared with CONGU to fulfil the purposes of the unified golf handicapping system; and
- e. member data will not be passed, sold or bartered to any outside agency for any purposes.

### **ACCURACY OF PERSONAL DATA**

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DGC will review personal data regularly to ensure it is accurate, relevant and up to date.

In order to ensure that DGC's files are accurate and up to date, and so that DGC is able to contact the individual member, members must notify DGC as soon as possible of any change in their personal details. The same requirement applies to staff.

### **ACCESS TO PERSONAL DATA ('SUBJECT ACCESS REQUEST')**

Individuals have the right to access personal data held about them. DGC will arrange for the individual to see or hear all personal data held about them within 30 days of receipt of a written request.

### **DATA BREACHES**

Where DGC becomes aware of a personal data breach it will, without undue delay and where feasible, not later than 72 hours of becoming aware of it, notify the personal data breach to the Information Commissioner's Office (ICO) unless DGC is able to demonstrate that the breach is unlikely to result in a risk to the rights and freedoms of individuals. Where the above aim cannot be achieved within 72 hours, an explanation of the reasons for delay will accompany the notification to the ICO and information may be provided in phases without undue further delay. In addition, data subjects will be notified without undue delay if the personal data breach is likely to result in a high risk to their rights and freedoms to allow them to take the necessary precautions. This notification will describe the nature of the personal data breach as well as recommendations for the individual concerned to mitigate potential adverse effects. This will be done as soon as reasonably feasible, and in close co-operation with the ICO.

### **ENSURING OUR COMPLIANCE**

For information on GDPR and individual rights and obligations, or to raise any concerns about personal data, contact Christopher Oldrey (General Manager) or Catherine Lawrie (Accounts Administrator) in the first instance. Compliance will be overseen by Julian Scopes (Management Committee).

**JULIAN SCOPES  
MANAGEMENT COMMITTEE  
DISS GOLF CLUB**

**APRIL 2018**

13/04/2018