

# London & Home Counties Region of the Golf Club Managers' Association

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# **Privacy Policy**

At Golf Club Managers' Association, London & Home Counties Region, known as GCMA-LHCR, we take your privacy seriously and this privacy statement explains what personal data or information we collect from you and from people who visit our website and how we use it.

#### Who are we?

GCMA-LHCR, is an Association, our registered office address is 91 Alderbury Road, Langley, Slough, Berkshire, SL3 8DL. For the purposes of Data Protection GCMA-LHCR, has now requirement to register with the ICO.

## What personal date or information do we collect?

The personal information we collect may include your name, address, email address, IP address and information regarding what pages you access on this website and when.

## How do we collect data or information from you?

- Make an enquiry via our website or via the telephone
- Use our website
- When you choose to receive news, updates or press releases
- Exchange business cards with a member of the Region

## How is your information used?

We collect your personal data or information to operate our Region effectively and provide you with the best information on our products and services.

We may use your information to:

- To administer your GCMA-LHCR membership
- To answer enquiries that you make prior to any agreement or contract.
- To keep you informed about our services, our insight into golfing trends and best practice, and invites to events, if you have opted-in to receive these communications.
- Invitation to Open competitions.
- Notifying you of your results
- To process payment(s)
- To maintain security of our office and IT infrastructure
- To invoice you, and to track payments you make or payments made to you

We believe that all these purposes are justified on the basis of our legitimate interests in running and promoting the Region, our contractual requirements to deliver the agreed membership services to you, and our legal obligations, as an Association. If you would like to know more, please read below:

- Members
- Prospective Members
- Suppliers
- Open Competition Entrants

## **Details of our processing**

	Type of Data Held	Length of Time Held	How Data is Held
Members	<ul> <li>Name and contact information.</li> <li>Emergency contact details.</li> <li>Information and documents relating to the membership we are providing,</li> </ul>	We will retain information about you for the duration of your membership relationship with us, then for an additional 6 years.	Data is stored in [ClubV1] which is hosted in secure servers within / outside the EEA www.clubsystems.com/ help-support,gdpr
	<ul> <li>including.</li> <li>communications</li> <li>with you.</li> <li>Billing and payment information.</li> <li>Member's handicap</li> </ul>	We retain financial records for 6 years, following the end of the current financial year.	Data is stored in [Microsoft Cloud] which is hosted in secure servers within / outside the EEA
		Handicap details are retained indefinitely	Handicap details are shared with howdidido (https://www.howdidido.com/Account/Login?returnUrl=%2f).
Prospective Members	<ul> <li>Name and contact information</li> <li>Information and documents relating to the services we are providing, including communications with you.</li> </ul>	We will retain information about you for the duration of the enquiry, then a further two years.	Data is stored in [ClubV1] which is hosted in secure servers within / outside the EEA www.clubsystems.com/ help-support,gdpr

Suppliers	<ul> <li>Contact details</li> <li>Bank details</li> <li>Description of the services bought</li> </ul>	We retain financial records for 6 years, following the end of the current financial year.	Data is stored on secure UK-based servers. Microsoft Cloud.
Open Competition Entrants	<ul><li>Contact Details</li><li>Dates of previous visits</li></ul>	We retain open competition details are retained indefinitely	Data is stored in (ClubV1] which is hosted in secure servers within / outside the EEA www.clubsystems.com/ help-support,gdpr

#### **Members Newsletter**

We use a third-party provider, Club V1, to deliver our members newsletters and competition invitations. We gather statistics around email opening and clicks using industry standard technologies including clear gifs to help us monitor and improve our e-newsletter. As a member you can manage what electronic communications you receive from the club and can unsubscribe at any time.

## **Emailing us**

We use Transport Layer Security (TLS) to encrypt and protect email traffic in line with government standards. If your email service does not support TLS, you should be aware that any emails we send or receive may not be protected in transit.

We will also monitor any emails sent to us, including file attachments, for viruses or malicious software. Please be aware that you have a responsibility to ensure that any email you send is within the bounds of the law.

## Who has access to your information?

We do not sell or rent your personal data or information to any third party or share your information with third parties for their marketing purposes.

We will disclose your data or information if required by law, for example by a court order or for the prevention of fraud or other crime.

We may pass your information on to our third-party service providers, agents or subcontractors (e.g. Digital Ocean) for the purposes of completing a task or providing services to you on our behalf (for example to manage your subscriptions). However, we disclose only the personal information necessary to deliver that service and have a contract in place that requires them to keep your information secure and not to use it for their own marketing purposes.

Third party services providers who act as data processors on our behalf:

• ACS Technologies provide the Dell Computer and at times may be required to access our systems for maintenance, upgrade and support services [e.g. external IT support the Association may use.

## Transfers outside of the European Economic Area

Your personal information in the European Economic Area (EEA) is protected by data protection laws, but other countries do not necessarily protect your personal information in the same way. The EEA covers all countries in the EU plus Norway, Liechtenstein and Iceland. GCMA-LHCR uses online tools which host data outside of the EEA. Prior to selecting such tools, we review their privacy policy and check that the company is signed up to the EU-US Privacy Shield agreement. Companies who have signed up to this agreement commit to securing personal data in line with EU data protection legislation.

## **Keeping your data secure**

When you give us personal information we take steps to ensure that it's treated securely and strive to protect it on our internal systems.

## Your rights

You have certain rights over the processing of your personal information by [golf club name]. These are:

- The right to be informed, which is what this privacy policy is for
- The right to access the data we hold about you
- The right to object to direct marketing
- The right to object to processing carried out on the basis of legitimate interests
- The right to erasure (in some circumstances)
- The right to data portability
- The right to have your data rectified if it is inaccurate
- The right to have your data restricted or blocked from processing

## How you can update your information

The accuracy of your information is important to us. If you change your contact details or if you want to update any of the information we hold on you, please contact us by email manager@gcma-lhcr.org or by post at GCMA-LHCR, 91 Alderbury Road, Langley, Slough, Berkshire, SL3 8DL. Alternatively, you can telephone us on 07889524279.

## How you can access your personal information

You have the right to ask for a copy of the personal information GCMA-LHCR hold relating to you. To do this please contact us by email manager@gcma-lhcr.org or by post at 91 Alderbury Road, Langley, Slough, Berkshire, SL3 8DL. Alternatively, you can telephone us on 07889524279.

You also have the right to lodge a complaint about our processing of your personal data with the UK's Information Commissioner's Office.

## Changes to this privacy notice

We keep our privacy notice under regular review. This privacy notice was last updated on  $12^{th}$  May, 2018