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## **BUNGAY AND WAVENEY VALLEY GOLF CLUB**

### **MEMBER PRIVACY NOTICE**

We are committed to respecting your privacy. This notice is designed to explain how we may use the personal information we collect from you before, during and after your membership with us. This notice applies to you if you have registered to become, or are a member of our club. This notice explains how we comply with the law on data protection and what your rights are. For the purposes of data protection, we will be the controller of any of your personal information.

References to 'we', 'our' or 'us' in this privacy notice are referring to Bungay and Waveney Valley Golf Club.

As an organisation, Bungay and Waveney Valley Golf Club values the personal information that is entrusted to us by our members, our staff, our visitors, our volunteers and other third parties. It is extremely important to us that we uphold that trust in the way in which we handle, use, store and protect personal data.

We are committed to adopting high standards in our protection of data and in addressing privacy concerns. Not only are we putting in place appropriate technical and security measures, but also ensuring that we have privacy and the protection of data at the heart of our decision-making processes across the organisation.

We are dedicated to being open and transparent with individuals about how we use and handle their information.

The GDPR came into effect on 25 May 2018. The GDPR is an EU Regulation and therefore will have direct effect in the UK, replacing the existing Data Protection Act 1998.

This privacy notice and other data protection-related policies operated by the Club have where possible, been written with the implementation of GDPR in mind. However, these documents will need to be reviewed and updated on an ongoing basis to ensure compliance.

Fundamental to the GDPR is a new standard of accountability. All organisations, including Bungay and Waveney Valley Golf Club, will be required to demonstrate and evidence how they comply with the data protection principles (as set out further in this privacy notice). Compliance with this privacy notice (and our other data protection-related policies) will assist us in doing so.

We are not required to appoint a Data Protection Officer (DPO) to oversee our compliance with data protection laws, as our data processing activity does not meet the necessary triggers for this. However, Andrew Collison, Karen Hind and Steven Peet will be our designated points of contact in terms of data protection.



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Please contact one of the designated points of contact for data protection, if you have any questions about the operation of this privacy notice, GDPR, or if you have any concerns that this privacy notice is not being followed.

The Management Committee of the Club will have overall responsibility for data protection compliance within the organisation and for ensuring this privacy notice (together with other data protection-related policies operated by the Club) are adhered to and comply with the relevant legal obligations.

This privacy notice will be reviewed from time to time by the Management Committee to ensure that its provisions continue to meet the relevant legal obligations and reflect best practice.

We recognise that the correct and lawful treatment of personal data will maintain confidence in the organisation and will help ensure successful business operations. Protecting the confidentiality and integrity of personal data is a critical responsibility that we take seriously at all times. It is important to note that the Club is exposed to potential fines of up to €20 million (approximately £18 million) or 4% of total worldwide annual turnover, whichever is higher and depending on the breach, for failure to comply with the provisions of the GDPR.

## **1. PERSONAL INFORMATION WE MAY COLLECT FROM YOU**

In order to help us provide an efficient and effective service for you, we may obtain personal information about you, such as:

- Personal contact details that allows us to contact you directly, such as your name, title, email addresses and telephone numbers
- Date of birth
- Gender
- Postal address
- CDH number
- Handicap
- Previous club/s
- Membership start and end date
- Records of your interactions with us such as telephone conversations, emails and other correspondence and your instructions to us
- Any credit/debit card and other payment details you provide so that we can receive payments from you and details of the financial transactions with you
- Records of your attendance at any events hosted by us
- Images in video and/or photographic form and voice recordings
- Your marketing preferences, so that we know whether and how we should contact you.
- Details of any county membership
- Details of next of kin, family members, coaches and emergency contacts



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- Records and assessment of any player rankings and competition results
- Any disciplinary and grievance information

## **2. SPECIAL CATEGORIES OF PERSONAL INFORMATION**

We may also collect, store and use the following “special categories” of more sensitive personal information regarding:

- Information about your race or ethnicity, religious beliefs and sexual orientation
- Information about your health, including any medical conditions, health and sickness records, medical records and health professional information

We may not collect all of the above types of special category personal information about you. In relation to the special category personal data that we do process, we do so on the basis that:

- The processing is necessary for reasons of substantial public interest, on a lawful basis
- It is necessary for the establishment, exercise or defence of legal claims
- It is necessary for the purposes of carrying out the obligations and exercising our or your rights in the field of employment and social security and social protection law; or
- Based on your explicit consent.

In the table below we refer to these as the “special category reasons for processing of your personal data”.

We may also collect criminal records information about you. For criminal records history we process it on the basis of legal obligations, or based on your explicit consent.

## **3. WHERE WE COLLECT YOUR INFORMATION**

We typically collect personal information about our members when you apply to become a member of the club, you purchase any services or products we offer, register on our website, when you make a query and/or complaint, or when you correspond with us by phone, e-mail or in some other way.

We also may collect personal information about you from any third party references you provide, as part of the application process for membership.

If you are providing us with details of referees, next of kin, beneficiaries, family members and emergency contacts, they have a right to know and to be aware of what personal information we hold about them, how we collect it and how we use and so we may share that information. Please share this privacy notice with those of them whom you feel are sufficiently mature to understand it. They also have the same rights as set out in the “Your rights in relation to personal information” section below.



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#### **4. USES MADE OF THE INFORMATION**

The table below describes the main purposes for which we process your personal information, the categories of your information involved and our lawful basis for being able to do this.

<b>Purpose</b>	<b>Personal information used</b>	<b>Lawful basis</b>
<b>To administer any membership you have with us and managing our relationship with you, including dealing with payments and any support, ancillary service or product enquiries made by you.</b>	All contact and membership details, transaction and payment information, records of your interactions with us, and marketing preferences.	This is necessary to enable us to properly manage and administer your membership contract with us.
<b>To arrange and manage any contracts for the provision of any services or products</b>	Contact details, transaction and payment information.  Records of your interactions with us.	This is necessary to enable us to properly administer and perform any contract for the provision of any ancillary services and products you have purchased from us.
<b>To send you information about your membership benefits package, including details about competitions and events, partner offers and discounts.</b>	Contact and membership details.	This is necessary to enable us to properly manage and administer your membership contract with us.
<b>To send you other marketing information we think you might find useful or which you have requested from us, including our newsletters, information about membership, events, products and information about our commercial partners</b>	Contact details and  Marketing preferences.	Where you have given us your explicit consent to do so.
<b>To answer your queries or complaints</b>	Contact details and records of your interactions with us	We have a legitimate interest to provide complaint handling services to you in case there are any issues with your membership.
<b>Retention of records</b>	All the personal information we collect.	We have a legitimate interest in retaining records whilst they may be required in relation to complaints or claims. We need to retain records in order to properly administer and manage your membership and run our club and in some cases we may have legal or regulatory obligations to retain records.  We process special category personal data on the basis of the "special category reasons for processing of your personal data" referred to in section 2 above.



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		For criminal records history we process it on the basis of legal obligations or based on your explicit consent.
<b>The security of our IT systems</b>	Your usage of our IT systems.	We have a legitimate interest to ensure that our IT systems are secure.
<b>To conduct data analytics studies to better understand event attendance and trends within the sport</b>	Records of your attendance at any events or competitions hosted by us.	We have a legitimate interest in doing so to ensure that our membership is targeted and relevant.
<b>For the purposes of promoting the club, our events and membership packages.</b>	Images in video and/or photographic form.	Where you have given us your consent to do so.
<b>To comply with health and safety requirements</b>	Records of attendance, CCTV footage and other information obtained through electronic means such as swipecard and key fob records, medical information about your health.	We have a legal obligation and a legitimate interest to provide you and other members of our organisation with a safe environment in which to participate in sport.  We process special category personal data on the basis of the "special category reasons for processing of your personal data" referred to in section 2 above.
<b>To administer your attendance at any courses or programmes you sign up to</b>	All contact and membership details,  Transaction and payment data.  Details of any county membership and performance data.	This is necessary to enable us to register you on to and properly manage and administer your attendance on the course and/or programme.
<b>To arrange for any trip or transportation to and from an event</b>	Identification documents details of next of kin, family members and emergency contacts, transaction and payment information, health and medical information.	This is necessary to enable us to make the necessary arrangements for the trip and/or transportation to an event.  We process special category personal data on the basis of the "special category reasons for processing of your personal data" referred to in section 2 above.
<b>To use information about your physical or mental health (including any injuries) or disability status, to ensure your health and safety and to assess your fitness to participate in any events or activities we host and to provide appropriate adjustments to our sports facilities.</b>	Health and medical information	We process special category personal data on the basis of the "special category reasons for processing of your personal data" referred to in section 2 above.
<b>To gather evidence for possible grievance or disciplinary hearings</b>	All the personal information we collect	We have a legitimate interest in doing so to provide a safe and fair environment for all members and to



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		<p>ensure the effective management of any disciplinary hearings, appeals and adjudications.</p> <p>We process special category personal data on the basis of the "special category reasons for processing of your personal data" referred to in section 2 above.</p> <p>For criminal records history we process it on the basis of legal obligations or based on your explicit consent.</p>
<b>For the purposes of equal opportunities monitoring</b>	<p>Name, title, date of birth</p> <p>gender, information about your race or ethnicity and health and medical information</p>	<p>We have a legitimate interest to promote a sports environment that is inclusive, fair and accessible.</p> <p>We process special category personal data on the basis of the "special category reasons for processing of your personal data" referred to in section 2 above.</p>
<b>To comply with legal obligations, for example, regarding people working with children or vulnerable adults to comply with our safeguarding requirements</b>	<p>Information about your criminal convictions and offences</p>	<p>For criminal records history we process it on the basis of legal obligations or based on your explicit consent.</p>

For some of your personal information you will have a legal, contractual or other requirement, or obligation for you to provide us with your personal information. If you do not provide us with the requested personal information, we may not be able to admit you as a member, or we may not be able to properly perform our contract with you, or comply with legal obligations and we may have to terminate your membership. For other personal information, you may not be under an obligation to provide it to us, but if you do not provide it then we may not be able to properly perform our contract with you.

Where you have given us your consent to use your personal information in a particular manner, you have the right to withdraw this consent at any time.

Please note however, that the withdrawal of your consent will not affect any use of the data made before you withdrew your consent and we may still be entitled to hold and process the relevant personal information to the extent that we are entitled to do so, on bases other than your consent. Withdrawing consent may also have the same effects as not providing the information in the first place, for example we may no longer be able to provide certain member benefits, or ancillary services to you.

**5. DIRECT MARKETING**

**Email, post and SMS marketing:** From time to time, we may contact you by email, post or SMS, with information about products and services we believe you may be interested in.

We will only send marketing messages to you in accordance with the marketing preferences you set. You can then let us know at any time that you do not wish to receive marketing



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messages by emailing [secretary@bungaygc.co.uk](mailto:secretary@bungaygc.co.uk). You can also unsubscribe from our marketing by clicking on any 'unsubscribe' links in the marketing messages we send to you.

## **6. DISCLOSURE OF YOUR PERSONAL INFORMATION**

We share personal information with the following parties:

- Any party approved by you.
- To any governing bodies or regional bodies for the sports covered by our club: to allow them to properly administer the sports on a local, regional and national level.
- Other service providers: for example, email marketing specialists, payment processors, data analysis CCTV contractors, promotional advisors, contractors or suppliers and IT services.
- Our Commercial Partners: for the purposes of providing you with information on any special offers, opportunities, products and services, or other commercial benefits provided by our commercial partners, as part of your membership package, only where you have given your permission to do so.
- The Government or our regulators: where we are required to do so by law, or to assist with their investigations or initiatives.
- Police, law enforcement and security services: to assist with the investigation and prevention of crime and the protection of national security.

## **7. TRANSFERRING YOUR PERSONAL INFORMATION INTERNATIONALLY**

The personal information we collect is not transferred to and stored in countries outside of the UK and the European Union.

## **8. HOW LONG DO WE KEEP PERSONAL INFORMATION FOR?**

The duration for which we retain your personal information will differ depending on the type of information and the reason why we have collected it from you. However, in some cases personal information may be retained on a long-term basis: for example, personal information that we need to retain for legal purposes will normally be retained in accordance with usual commercial practice and regulatory requirements. Generally, where there is no legal requirement, we retain all physical and electronic records for a period of 6 years after your last contact with us, or the end of your membership. Exceptions to this rule are:

- CCTV records which are held for no more than 30 days, unless we need to preserve the records for the purpose of prevention and detection of crime.
- Details regarding unsuccessful membership applicants, where we hold records for a period of not more than 12 months.
- Information that may be relevant to personal injury or discrimination claims may be retained until the limitation period for those types of claims has expired. For personal



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- injury or discrimination claims this can be an extended period as the limitation period might not start to run until a long time after the event.

It is important to ensure that the personal information we hold about you is accurate and up-to-date and you should let us know if anything changes- for example, if you change your phone number or email address. You may be able to update some of the personal information we hold about you through our website. Alternatively, you can contact us by using the details set out in the "Contacting us" section below.

## **9. YOUR RIGHTS IN RELATION TO PERSONAL INFORMATION**

You have the following rights in relation to your personal information:

- The right to be informed about how your personal information is being used
- The right to access the personal information we hold about you
- The right to request the correction of inaccurate personal information we hold about you
- The right to request the erasure of your personal information in certain limited circumstances
- The right to restrict processing of your personal information where certain requirements are met
- The right to object to the processing of your personal information
- The right to request that we transfer elements of your data either to you or another service provider and
- The right to object to certain automated decision-making processes using your personal information.

Whilst this privacy notice sets out a general summary of your legal rights in respect of personal information, this is a very complex area of law. More information about your legal rights can be found on the Information Commissioner's (ICO) website at <https://ico.org.uk/for-the-public/>.

To exercise any of the above rights, or if you have any questions relating to your rights, please contact us, by using the details set out in the "Contacting us" section below.

If you are unhappy with the way we are using your personal information, you can also complain to the UK Information Commissioner's Office, or your local data protection regulator. We are here to help though and encourage you to contact us to resolve your complaint first where possible.

## **10. CHANGES TO THIS NOTICE**

We may update this privacy notice from time to time. When we change this notice in a material way, we will update the version date at the bottom of this page. For significant



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changes to this notice, we will try to give you reasonable notice, unless we are prevented from doing so. Where required by law, we will seek your consent to changes in the way we use your personal information.

#### **11. CONTACTING US**

In the event of any query or complaint in connection with the information we hold about you, please email [secretary@bungaygc.co.uk](mailto:secretary@bungaygc.co.uk)

Version dated 21<sup>st</sup> May 2018.