



Data Protection Policy – **Halifax Bradley Hall Golf Club** – March 2018

Our Commitment:

Halifax Bradley Hall Golf Club (HxBHGC) is committed to the protection of all personal and sensitive data for which it holds responsibility as the Data Controller and the handling of such data in line with the data protection principles and the General Data Protection Regulation 2018 (GDPR) and the Data Protection Act 2018 (DPA).

<https://ico.org.uk/for-organisations/guide-to-data-protection/data-protection-principles/>

Changes to data protection legislation shall be monitored and implemented in order to remain compliant with all requirements.

The member of staff responsible for data protection is: **Janet Teale** The clubs Administration Manager and Data Protection Officer (DPO)

HxBHGC is also committed to ensuring that its staff, are aware of data protection policies, legal requirements and adequate training is provided to them. It will also ensure that the Club Committees and the General Membership are aware of their responsibilities for the protection of data.

The Data Protection Policy covers the collation, storage, use and disposal for all Members, Shareholders, Visitors and Staff. All parties have the same rights under this policy. The Club will remove aged data that is deemed not necessary in a timely manner as outlined within this policy.

The requirements of this policy are mandatory for all staff employed by HxBHGC and any third party contracted to provide services within HxBHGC

Notification:

Our data processing activities are exempt from being registered with the Information Commissioner's Office (ICO) however details can be obtained regarding all Data Processors from the ICO:

<https://ico.org.uk/about-the-ico/what-we-do/register-of-data-controllers/>

Breaches of personal or sensitive data shall be notified immediately to the individual(s) concerned and the ICO.

Personal and Sensitive Data:

All data within HxBHGC control shall be identified as personal, sensitive or both to ensure that it is handled in compliance with legal requirements and access to it does not breach the rights of the individuals to whom it relates.

The definitions of personal and sensitive data shall be as those published by the ICO for guidance: <https://ico.org.uk/for-organisations/guide-to-data-protection/key-definitions/>

The principles of the Data Protection Act shall be applied to all data processed:



Data Protection Policy – Halifax Bradley Hall Golf Club – March 2018

1. Processed fairly and lawfully
2. Obtained only for lawful purposes, and is not further used in any manner incompatible with those original purposes
3. Accurate and, where necessary, kept up to date,
4. Adequate, relevant and not excessive in relation to the purposes for which it is processed
5. Not kept for longer than is necessary for those purposes
6. Processed in accordance with the rights of data subjects under the DPA
7. Protected by appropriate technical and organisational measures against unauthorised or unlawful processing and against accidental loss, destruction or damage
8. Not transferred to a country or territory outside the European Economic Area unless that country or territory ensures an adequate level of protection of the personal information

Fair Processing / Privacy Notice:

We shall be transparent about the intended processing of data and communicate these intentions via notification to staff, members and visitors prior to the processing of individual's data.

Notifications shall be in accordance with ICO guidance and, where relevant, be written in a form understandable by those defined as members or private individuals under the legislation.

<https://ico.org.uk/for-organisations/guide-to-data-protection/privacy-notice-transparency-and-control/>

The intention to share data relating to individuals to an organisation outside of our Club shall be clearly defined within notifications and details of the basis for sharing. Data will be shared with external parties in circumstances where it is a legal requirement to provide such information.

Any proposed change to the processing of individual's data shall first be notified to them.

Data Security:

In order to assure the protection of all data being processed and inform decisions on processing activities, we shall undertake an assessment of the associated risks of proposed processing and equally the impact on an individual's privacy in holding data related to them.

Risk and impact assessments shall be conducted in accordance with guidance given by the ICO:

<https://ico.org.uk/for-organisations/guide-to-data-protection/principle-7-security/>



Data Protection Policy – **Halifax Bradley Hall Golf Club** – March 2018

Security of data shall be achieved through the implementation of proportionate physical and technical measures. Nominated staff shall be responsible for the effectiveness of the controls implemented and reporting of their performance.

The security arrangements of any organisation with which data is shared shall also be considered and these organisations shall provide evidence of the competence in the security of shared data.

Data Access Requests (Subject Access Requests):

All individuals whose data is held by us, has a legal right to request access to such data or information about what is held. We shall respond to such requests within 30 days and they should be made in writing to: **Janet Teele Administration Manager**

A charge may be applied to process the request.

https://ico.org.uk/media/for-organisations/documents/1586/personal_information_online_small_business_checklist.pdf

Photographs and Video:

Images of members, staff and visitors may be captured at appropriate times and as part of sporting activities for use on the Clubs website or notice boards. Or via Social Media

Unless prior consent from members, visitors and staff has been given, the Club shall not utilise such images for publication or communication to external sources other than the website or social media which is viewed by members of the public and members

It is Club policy that external parties may not capture images of staff or members during such activities without prior consent.

Data Disposal:

The Club recognises that the secure disposal of redundant data is an integral element to compliance with legal requirements and an area of increased risk.

All data held in any form of media (paper, electronic) shall be shredded or deleted and if shredded only passed to a disposal partner with demonstrable competence in providing secure disposal services.

All data shall be destroyed or eradicated to agreed levels meeting recognised national standards, with confirmation at completion of the disposal process.

Disposal of IT assets holding data shall be in compliance with ICO guidance:

https://ico.org.uk/media/for-organisations/documents/1570/it_asset_disposal_for_organisations.pdf

The Club will ensure that disposal of any IT assets and collections will only be made after the hardware has been cleansed of software and data, before disposal.



Data Protection Policy – **Halifax Bradley Hall Golf Club** – March 2018

The Club website uses cookies and collects IP addresses (an IP address is a number that can uniquely identify a specific computer or other network device on the internet). We use analysis software to look at IP addresses and cookies for the purpose of enhancing your user experience. This information is not used to develop a personal profile of you and the log files are regularly purged. The club use Google Analytics to identify trends of usage but not to identify individuals

Categories of Data stored and method of storage

- **Club Systems V1 software** – Member details, contact details, financial information appertaining to membership and monies on members card. Information regarding golf scores, attendance and handicap. Recording of Golf Visitor entrants into the club open events for the purpose of playing golf in line with reasonable use for the purpose of managing scores and handicap communications to the person and their home club.
- **Club Website** - The digital signature identity of members and visitors to the website regarding the use of cookies on Halifax Bradley Hall Golf Club websites and how you can reject these cookies.
- **BRS** - Member log in and contact details, Member booking of tee-times and enrolling guests as visitors allowing for members to join other members in the game of golf. Recording of Visitor tee bookings either in person or on-line via a third-party application
- **Golf Professional** - Member accounts and contact details of Members and Visitors
- **Office hard files** - Member application forms renewal notices and general letters received into and sent out of the club to an individual, Visitor Email address's if permitted by opt-in
- **Office PC's** – Office staff computers, Bar Till, Pro Shop PC and Pro Shop Till, Club Officials will have access to members personal details and the club's software where occasions are required to use software systems for managing and running Golf & Social events.
- **Specific data appertaining to the health of member or visitor** – Where the requirement to collate, record and store insurance documents and medical confirmation of condition that relates to the use of mechanical vehicles where used on the course under the conditions of the Equality Act 2010. This will be in paper form kept in the office.

Categories of communication methods: -

- **Club Systems V1 software** - Email communication to individuals or as groups as defined by there club membership category of membership of an internal club group
- **Newsletter** - Production that allows for member unsubscribe as deemed relevant to ensure membership is pertinent and the member is kept informed
- **Club News** - Alerts and notifications of activities important to members obtaining benefits from membership and announcements of subjects affecting there playing rights



Data Protection Policy – **Halifax Bradley Hall Golf Club** – March 2018

- **Club V1 Members Hub**- Mobile app that allows for notifications to be received by members and a method of communication between members who have allowed others to view personal contact details
- **Club Website** – Announcements and updates that will not include personal details in the non-member section. Member log in is required to see other member details which are amendable by the members to allow other members to contact them and see contact details
- **Campaign monitor** - Email based marketing software that provides a facility to promote club events, opens and offers
- **Notice Boards** - Notices announcing competition entry via member entering details of how to contact, Handicap announcements to ensure members can play competitive golf against other members, this also includes member entry for Golf & Social events where names are required to be logged
- **Office Computers** - Personal financial details and records of membership and payments made in or out of the club, Email functions for forwarding important company information and notices to member shareholders of the company
- **Office Hard files** - Member application forms, contact details, records of competition results printed from the Golf Software
- **Officials letter trays** - Location of any personal letters for club officials
- **HowDidIDo**- is a third-party software provider which the member personally decides to join and therefore the club have no control of what happens to the members details whilst on this site. This site pulls information from the club software systems, website and members hub.
- **Club V1 Members HUB** - is third party software that the member personally decided to join and use therefore the club have no control of what happens to the members details whilst on the app. This app pulls information from the club software system & website.

Member & Visitor collation and storage methods: -

- **Club Systems V1 software** – Visitor details, contact details, Information regarding golf scores, attendance and handicap
- **Club Website** - The website contains hyperlinks to websites owned and operated by third parties. These third-party websites have their own privacy policies, including cookies, and we urge you to review them. They will govern the use of personal information you submit or are collected by cookies whilst visiting these websites. We do not accept any responsibility or liability for the privacy practices of such third-party websites and your use of such websites is at your own risk.
- **Club Website contact us page**- The facility to communicate with the club with the facility to opt-in or opt-out of return communications.
- **BRS** - Visitor booking details including payment and contact details, Option for Opt-in provided when visitor is booking on line for marketing and contact permissions
- **Golf Professional** - Visitor contact details, with Opt-in permissions gained via a Visitor Signature Insurance Form
- **Club Office** - Hard copy storage of society, visitor details and insurance forms, including documents relating to the use of mechanical vehicles will be kept under secure lock and key



Data Protection Policy – Halifax Bradley Hall Golf Club – March 2018

- **CCTV** – The use of CCTV is essential to provide security to individuals and the club premises; the club therefore use a data storage device which captures images which may from time to time include a member of visitor. It is a requirement of the Premises License to use such a device and is therefore a legal requirement and individuals have no recourse against the club for this reason. However, access to the storage will only be made available to the authorities in investigation of a crime or by authorised management of the club in investigation an allegation of breach of policy or minor incident. No screenshot data capture is permissible for any other cause.

Timelines for storage of data for Members, Visitors and Staff: -

- Members for the duration of a person's membership of the club as they remain a shareholder in the company
- Member leavers will remain on computer files and archived into the resigned file due to the requirement to provide information to other member golf club where member may join, where information removal could jeopardise the past members golf records
- Visitors contact details remain on PC storage within the software systems for a duration of 5 years to provide marketing and contact opportunities only if the person has subscribed to receive them
- Competition winner's names only will be placed on the appropriate honours board, to maintain the historical record collation of past and future winners all other details will remain within the club's computer system as part of the handicapping record of the player
- Documents for member and visitor usage of mechanical vehicles will be kept for the duration of their membership and 5 years respectively
- CCTV images will be kept on a computer hard drive for 30 days
- Staff records will be kept during their employment and up to 10 years post-employment for reference and official requests from employment authorities

Obtaining personal details of Non-Members/Visitors: -

- Through a visitor booking via a third-party website, which enables the clubs BRS booking system to record personal details regarding the booking of a tee- time of function room
- Condition of entering a club open event where contact and golf details are a condition of play which will be stored within Club V1, BRS the office computer and the Pro Shop computer where forwarding of player information to the governing bodies central Handicap base, a player's home club or to a country golf union or district golf union is a requirement to play competitive golf.
- Visitor Day Insurance Form which will be kept for 5 years which includes an Opt-in option for marketing and contact purposes relating to golf events.
- Use of Message pads by an internal third party - which will be destroyed once the message has been relayed to the intended recipient

Rights of a member, visitor or staff employee: -

- To have the right to be forgotten – which the member must realise may limit their enjoyment of their membership and impact their ability to act as a shareholder of Halifax Bradley Hall Golf Club Ltd in exercising their right to be informed of notices and meetings
- The right to be allowed to opt-in to receiving future communications regarding promotional material and offers including competition dates and events



Data Protection Policy – Halifax Bradley Hall Golf Club – March 2018

- The right to be allowed to opt-out of receiving communications once an opt-in choice has been made
- To request to see all records kept by the club about themselves but no one else
- To request removal of all records, **however the ability to play in club's competitions will be withheld if removal is from the club's handicap software**
- To report any mis-use of personal data to the Clubs Designated DPO and the ICO
- For a member applicant to state they do not want personal data stored and be provided with an opportunity to agree to data storage prior to their application
- To enable a visitor to enrol in receiving marketing communications

A personal right to be forgotten: -

HxBHGC operate 3 key internal and external software data capture and communication programmes. Members select a consent via their application form to receive club communications.

- Club V1 provides a member the opportunity to choose what information they receive, it also runs the website which allows members total control on what information that is deemed personal is made available to other members. No personal details are available to be viewed by non-members.
- Club V1 provides Emails / Newsletters / Club News. These programmes provide an opportunity on every communication for any recipient to decide their own preferences
- BRS provides a member or visitor the opportunity to choose what information they receive via preferences within their registration on receipt of each communication
- Campaign Monitor provides a recipient the ability to select or amend their own preferences on receipt of each communication

Security of data: -

- Provision of computer access to authorised officials and members representatives of the club with dedicated password log ins
- Office data kept under lock and key in a secure Cabinet and Office
- Office access limited by code access to door
- CCTV kept on computer hard-drive and removed after 30 days
- Removal of till receipts by bar staff if not required by the member
- Member option to manage own contact details via the club's website
- Credit card details are entered on a secured page and that they are transferred using SSL technology. 'We use Sage Pay to collect/process transaction information' and you can view their privacy policy at http://www.sagepay.com/security_policy

Contacting Halifax Bradley Hall Golf Club about this Privacy Policy -If you have any questions or comments about this policy please contact; The Administration Manager on 01422 374108 ext.5 or email admin@bradleyhallgolf.co.uk