Buckingham Golf Club Privacy Policy

Summary

At Buckingham Golf Club, 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. This policy complies with The General Data Protection Regulation which came into force on 25th May 2018.

Who are we?

Buckingham Golf Club is a registered company (Registration Number 08882890) our registered office address is Tingewick Road, Buckingham MK18 4AE. For the purposes of Data Protection the Data Controller responsible for collecting information on this website is the Club site owner.

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
- Take part in a prize draw or competition
- When you choose to receive news, updates or press releases
- Enquire about a job opportunity
- Work for or with the golf club
- Exchange business cards with a member of the golf club

How is your information used?

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

We may use your information to:

- To administer your golf club 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) for green fee visitors
- To process a job application
- To fulfil our obligations as an employer
- To provide benefits to you as an employee
- 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 golf club, our contractual requirements to deliver the agreed membership services to you, and our legal obligations, both as a golf club and responsible employer. If you would like to know more, please read below:

- Members
- Prospective Members
- Job Applicants, Our Current and Former Employees
- Business Partners (e.g. professional golfer)
- Suppliers
- Open Competition Entrants
- Green fee visitors

Details of our processing

	Type of Data Held	Length of Time Held	How Data is Held
Members	 Name and contact information. Emergency contact details. Information and documents relating to the membership we are providing, including. communications with you. Billing and payment information. Member's handicap Under 18's medical conditions requiring treatment. 	We will retain information about you for the duration of your membership relationship with us, then for an additional 6 years. We retain financial records for 6 years, following the end of the current financial year. Handicap details are retained indefinitely	Data is stored in applications provided by Clubsystems & BRS golf. which are hosted in secure servers within / outside the EEA Data is stored in Sage online backup which is hosted by CloudyIT in secure servers within / outside the EEA Handicap details are shared with howdidido (https:// www.howdidido.com/ Account/Login? returnUrl=%2f).
Prospective Members	 Name and contact information Information and documents relating to the services we are providing, including communications with you. 	We will retain information about you for the duration of the enquiry, then a further two years.	Data is stored in applications provided by Clubsystems & BRS golf. which are hosted in secure servers within / outside the EEA
Job Applicants	 Name and contact information CV and application form. 	We will retain information about you for the duration of the recruitment campaign, then one year.	Data is stored in manual records in locked filing cabinets and computer held records are password controlled. Data Backups are store offsite by CloudyIT

Current and Former Employees	 Name, date of birth, and contact information National insurance number and Unique Tax Reference (UTR) Information relating to your qualifications and experience Information relating to performance reviews. 	We will retain information about you for the duration of our contractual relationship with you, then for an additional 6 years.	Data is stored on secure EEA-based servers Data Backups are store offsite by CloudyIT
Suppliers	 Contact details Bank details Description of the services bought 	We retain financial records for 6 years, following the end of the current financial year.	Data is stored on secure UK-based servers. Data Backups are store offsite by CloudyIT
Open Competition Entrants	 Contact Details Dates of previous visits 	We retain open competition details are retained indefinitely	Data is stored in applications provided by Clubsystems & BRS golf. which are hosted in secure servers within / outside the EEA
Green Fee Visitors	 Payment details Name 	We retain information about you for one year after your last visit. We retain financial records for 6 years, following the end of the current financial year.	Data is stored in manual records in locked filing cabinets. Data is stored on secure UK-based servers.

Members Newsletter

We use a third-party provider, Clubsystems, 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 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:

- **Sage** provide payroll & accounting services to Buckingham Golf Club. They cannot use the data we hold for their own purposes.
- CloudyIT provide IT support and backup services and at times may be required to access our systems for maintenance, upgrade and support services [e.g. external IT support the club 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. Buckingham Golf Club 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 Buckingham Golf Club. 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 at <u>office@buckinghamgolfclub.co.uk</u> or by post at Buckingham Golf Club, Tingewick Road, Buckingham MK18 4AE Alternatively, you can telephone us on 01280 815566.

How you can access your personal information

You have the right to ask for a copy of the personal information Buckingham Golf Club hold relating to you. To do this, please contact us by email at <u>office@buckinghamgolfclub.co.uk</u> or by post at Buckingham Golf Club, Tingewick Road, Buckingham MK18 4AE. Alternatively, you can telephone us on 01280 815566. The Club will provide you with requested information within 30 days or sooner if circumstances permit.

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

CCTV

Whilst the Club has a network of CCTV Cameras on the premises, these are not monitored. There are there for security and safety purposes only, acting as a deterrent and as back up should an incident happen on the Club premises and recorded by the system. Recordings get deleted as the system gets to its storage capacity, which is typically around every two weeks or so. Oldest are automatically deleted as new recordings occur. Only two people have password access and they can only access recordings if an incident occurs. No reviewing of the recordings is allowed by anyone without a legally valid reason for doing so.

Changes to this privacy notice

We keep our privacy notice under regular review. This privacy notice was last updated on 22/05/2018, and complies with the General Data Protection Regulation (GDPR) which became law on May 25th 2018; GDPR replaces the Data Protection Act 1998.