



## GDPR – AN EXTENSION TO THE PRIVACY NOTICE

### Nelson Golf Club

This communication has been provided to attempt to wrap up all the difference components and elements of the new GDPR legislation to give clarity, transparency and knowledge to all for whom the Golf Club retains personal data.

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## Awareness

Council were made aware of the importance of GDPR in February 2018.

Those who access this information have been trained in the compliance of usage and the importance of maintaining privacy and ways to prevent breaches

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## Information we hold

We hold information for what we believe is a legitimate reason. All of this information has been garnered by the individual providing it to us, either via a Membership Application Form, a Visitor Online Tee Reservation, a Society/Visiting Party booking over the phone and Staff New Starter Forms. The below is designed to tabulate where this information is held, what is held, why it is held and who has access to this and why.

The following information is held about our **Members** which we perceive to be “personal data”

Where held?	What is held?	Why is it held? (legitimacy)	Who can see this?	How long is it held?
Club v1	Name	To identify each Member	System, Membership & Golf Admins	For the duration Membership is held
Club v1	Gender	To determine eligibility for Competitions and to analyse the number of members by category	System, Membership & Golf Admins	For the duration Membership is held
Club v1	Age	To determine eligibility for certain competitions and to determine the transition into Membership Categories which are restricted by age	System, Membership & Golf Admins	For the duration Membership is held
Club v1	Length of Membership	Primarily for research purposes though also to determine eligibility into Membership Categories based on length of Membership service	System, Membership & Golf Admins	For the duration Membership is held

Club v1	Joining Date	Primarily as a starting point for the first invoice for Membership, though also to manage the starting point for Length of Membership	System, Membership & Golf Admins	For the duration Membership is held
Club v1	Email Address	To communicate with the Member, including but not limited to sending the Annual Subscription Invoice, providing important updates about the Club, providing competition results and promoting Club events and products. Note all Members have the option to Opt In/Out based on their preferences for communications	System, Membership & Golf Admins	For the duration Membership is held
Club v1	Telephone Numbers	To enable communication with Members when email is either not appropriate or available	System, Membership & Golf Admins	For the duration Membership is held
Club v1	Address	Primarily for communication purposes though generally only in the event that an email is not held, or if the communication is of a sensitive nature. Also held for research purposes (i.e. demographics)	System, Membership & Golf Admins	For the duration Membership is held
Club v1	Category of Membership	To enable the correct invoicing of subscriptions, the eligibility of competition entry and for research purposes	System, Membership & Golf Admins	For the duration Membership is held
Club v1	Finance	We retain financial information in two forms; EPOS transactions and balance and Membership payments and balance. Both are held to ensure the correct financial management of all Members	System & Membership Admins	For the duration Membership is held
Club v1	Notes	These can include any health issues which may have been reported by the Member to the Club. These are required to enable the Club to make appropriate decisions over whether suspension of Membership may be a necessary move to aid the Member	System & Membership Admins	For the duration Membership is held

Note in instances where a Member pays their Membership Subscriptions by monthly payment, the Member will have provided personal data to Premium Credit including Bank Account details and some of the above. This is an arrangement solely between Premium Credit and the Member.

The following information is held about our **Visitors** which we perceive to be “personal data”

Where held?	What is held?	Why is it held?	Who can see this?	How long is it held?
BRS	Gender	By way of salutation. Held for marketing purposes to promote gender specific golfing events	Administrators	Indefinitely, unless informed by the Visitor
BRS	Name	To identify each Visitor	Administrators	Indefinitely, unless informed by the Visitor
BRS	Email Address	To communicate with the Visitor regarding any reservations made, and to promote any future events which we feel may be of interest to them. Note all Visitors have the option to Opt In/Out based on their preferences for communications	Administrators	Indefinitely, unless informed by the Visitor
BRS	Telephone Number	To communicate with the Visitor when email is either not appropriate or available		Indefinitely, unless informed by the Visitor
BRS	Address	Primarily for communication purposes though generally only in the event that an email is not held, or if the communication is of a sensitive nature. Also held for research purposes (i.e. demographics)	Administrators	Indefinitely, unless informed by the Visitor
BRS	Notes	Solely for the purpose of any reservations made for golf	Administrators	Indefinitely, unless informed by the Visitor

The following information is held about our **Staff** which we perceive to be “personal data”

Where held?	What is held?	Why is it held?	Who can see this?	How long is it held?
GM Office Filing Cabinet – locked	Name	For identification purposes	General Manager	For 7 years after leaving to comply with Financial Regs
GM Office Filing Cabinet – locked	Address	For identification and communication purposes	General Manager	For 7 years after leaving to comply with Financial Regs
GM Office Filing Cabinet – locked	Email Address	For communication purposes	General Manager	For 7 years after leaving to comply with Financial Regs
GM Office Filing Cabinet – locked	Telephone Number	For communication purposes including emergency	General Manager	For 7 years after leaving to comply with Financial Regs
GM Office Filing Cabinet – locked	Next of Kin Details	For emergency communication purposes a name and telephone number is held	General Manager	For 7 years after leaving to comply with Financial Regs

GM Office Filing Cabinet – locked	Rate of pay	For the correct payment of wages/salary and PAYE/NI	General Manager & Council	For 7 years after leaving to comply with Financial Regs
GM Office Filing Cabinet – locked	National Insurance Number	For the correct payment of wages/salary and PAYE/NI	General Manager & Council	For 7 years after leaving to comply with Financial Regs
GM Office Filing Cabinet – locked	Previous Employment Details (P45)	For the correct payment of wages/salary and PAYE/NI	General Manager & Council	For 7 years after leaving to comply with Financial Regs

In some cases Staff telephone numbers with express consent will be provided to the Club intruder alarm provider in order that emergency response can be provided in the event of an alarm activation.

In addition, in order to process payroll accurately, our outsourced payroll provider UK Payroll Services is also provided with the above information, with the exception of Telephone Number and Next of Kin Details

## Communicating Privacy Information

The Club Privacy Notice is provided online on the Club Website, and is also provided here:

# Privacy Policy



### INTRODUCTION

This privacy policy sets out how we use and protect any information that you give to us when you visit this website, book an online tee time or Open Competition or apply to become a Member.

We are committed to ensuring that your privacy is protected. Should we ask you to provide certain information by which you can be identified then you can be assured that it will only be used in accordance with this privacy statement.

In regard to the Club website and our associated marketing activities and databases, Nelson Golf Club manages personal data and are fully compliant with General Data Protection Regulations (GDPR).

Your privacy is of the highest importance to us, and we will never release your personal details to any third party without your express consent.

When you complete a 'personal profile' or Membership Application Form certain personal information is collected from you (for example: your name, email address, gender, golf handicap or ability, member status i.e. member or non-member).

All such information is held securely by Nelson Golf Club which endeavours to comply with all applicable Data Protection and consumer Regulations, and will treat all your personal information as confidential.

We may change this policy from time to time by updating this page and will notify you accordingly.

This policy is effective from 22<sup>nd</sup> May 2018

## **WHAT WE COLLECT**

We may collect the following information:

- Name and surname
- Email address
- Telephone Number
- Gender
- Handicap ability
- Member or non-member
- CDH Number
- Previous Club (or current Club in the case of a Visitor Booking)

## **WHAT WE DO WITH THE INFORMATION WE GATHER**

We require this information to understand your needs and provide you with a better service and, in particular, for the following reasons:

- Internal record keeping.
- To improve our products and services.
- We may periodically send promotional emails about special offers, competitions, results or other information which we think you may find interesting using the email address which you have provided.
- From time to time, we may also use your information to contact you for market research purposes. We may contact you by email.
- We may use the information to customise the website according to your interests.

## **CONTACT POLICY**

We would like you to be the first to receive offers and news about the golf club. We do this in various ways including email, post, SMS, phone and social media but only if you would like to receive our communications.

Your privacy is very important to us which is why we make sure you're always in control of what we do with your personal information.

This is our simple customer contact promise:

- We will never pass your personal details to any third party other than our data processors Club V1 (Club Systems International), BRS (Golf Now) and Premium Credit (for those paying their Membership Subscriptions via this service)
- We will only use your details to help personalise communications.

We will make sure our contact with you is relevant based on the information you give us.

You can opt out at any time.

All you need to do is email [secretary@nelsongolfclub.com](mailto:secretary@nelsongolfclub.com) and notify us of your contact preferences and we will stop contacting you henceforth

We'll always comply with the Data Protection Act 1998 and GDPR.

- Please do let us know if your details change so that we can continue to stay in touch.

## **SECURITY**

We are committed to ensuring that your information is secure. In order to prevent unauthorised access or disclosure, we have put in place suitable physical, electronic and managerial procedures to safeguard and secure the information we collect from you.

### International Transfers of your Personal Information

We do not transfer your personal information to International third parties.

### Personal Data Security and Confidentiality

We maintain adequate technical and organisational security measures to protect your personal information from loss, misuse, and unauthorised access, disclosure, alteration, or destruction.

### Access and Correction Rights

You can request access to, and have the opportunity to update and amend your personal information, and you can exercise any other rights you enjoy under applicable data protection laws, including, for example, objection to and blocking of the processing of your personal information, by emailing

[secretary@nelsongolfclub.com](mailto:secretary@nelsongolfclub.com) - for security reasons, we reserve the right to take steps to authenticate your identity before providing access to your personal information.

### Retention of Data

We will keep your personal information for as long as necessary for the purposes for which it was collected, to provide you with services and to conduct our legitimate business interests or where otherwise required by law.

### Changes to the Policy

We reserve the right, at our sole discretion, to modify, add or remove sections of this privacy policy at any time and any changes will be notified to you using the email address you have given us or by an announcement on the webpage available at the “Privacy Policy” link.

### Privacy Queries

If you have any questions regarding this policy, or you wish to update your details or remove your personal data from our records, please inform us by emailing [secretary@nelsongolfclub.com](mailto:secretary@nelsongolfclub.com)

Should you wish to do so further information can be obtained from the Information Commissioners Office at the [ICO web site](#)

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## Individuals’ Rights

We take individuals rights seriously, and set out our procedures below:

Your Right	Our Procedure
The right to be informed	We will inform you at the point of collection (either via Membership Application Form, Visitor Booking Form or Staff Starter Form) where and how we will hold you information, for how long and who will have access.  This document further ensures the transparency of this management of privacy information
The right of access	You can request access to the information held by Nelson Golf Club by submitting your request in writing to <a href="mailto:secretary@nelsongolfclub.com">secretary@nelsongolfclub.com</a> – we commit to ensure you have a response in a format which is commonly available within a calendar month
The right to rectification	In the event that the personal data we hold for you is incorrect and you have informed us as such, we will ensure your data is updated accordingly or erased
The right to erasure	We will erase your data (or elements of it) on request if: <ul style="list-style-type: none"><li>• the information we hold for you is no longer necessary for the purpose for which we initially collected it; or</li><li>• if we no longer have a lawful basis for holding it; or</li><li>• there is no longer a legitimate interest for holding it; or</li><li>• we are using the data for marketing purposes and you object; or</li><li>• we have processed the data unlawfully; or</li><li>• we must erase the data to comply with a legal obligation.</li></ul>
The right to restrict processing	An alternative to requesting erasure, we will comply with requests by temporarily removing data from the place where it is generally processed and make the data unavailable to users
The right to data portability	We do not own your data, therefore you are free to use the data that we hold for you across any other service or platform. We will

	ensure the information we hold for you can be transferred to you in a format which is widely available
The right to object	In our case, generally the main objection would be relating to marketing or research statistical purposes. In regards to Marketing we have a stringent mechanism in place to ensure that the systems we use manage this correctly, and give the individual absolute management of this via an opt in process. In regards research/statistical requests, the Club will determine whether we have a legitimate reason for maintaining and processing your data before considering the application of your right to object
The right not to be subjected to profiling and automated decision making	We will not profile in any way. To aid this we have removed none-legitimate aspects of data held specifically "Employer/Job"

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## Subject Access Requests

We will process Subject Access Requests within one calendar month of receipt. All subject access requests should be made in writing to the General Manager either by email to [secretary@nelsongolfclub.com](mailto:secretary@nelsongolfclub.com) or via post to The General Manager, Nelson Golf Club, Kings Causeway, Brierfield, Nelson, BB9 0EU.

Your data may be held in the following places, each of which will be interrogated, and the information extracted and put into a Microsoft Word document, converted to PDF and sent to you via your preferred method (i.e. if you email us we will email you, if you write to us we will write back):

Outlook email system – [secretary@nelsongolfclub.com](mailto:secretary@nelsongolfclub.com)

Outlook email system – [competitions@nelsongolfclub.com](mailto:competitions@nelsongolfclub.com)

BRS

Club v1

UK Payroll Services

Premium Credit (though this is a contractual agreement between Premium Credit and the Member)

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## Lawful basis for holding data

Our lawful basis for maintaining your data is set out in the above section "Information we hold"

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## Consent

**Club v1:** As a Club we have emailed all Members asking them to opt in to continue to receive communications. All other information held is deemed to be consensual on the basis of legitimacy and contractual.



**BRS:** All visitors currently in the database have been emailed highlighting our Privacy Policy. New Visitors will be agreeing to our Terms and Conditions through making a reservation, which highlights our commitment to GDPR and a link to our Privacy Policy

**Staff:** All Staff have been notified of our Privacy Policy and how we hold their data, and their options made clear to them.

## Children

Club v1 provides a series of levels protection to ensure children's data is protected. There is the opportunity for the Club to use parental communication as the primary form of communication.

A review of the Child Protection Policy takes place annually with the Child Welfare Officer reviewing its appropriateness and legitimacy.

On application, Junior Members are required to gain parental consent or otherwise for the use of photographs.

The only time a Juniors contact details would be distributed outside of the Club would be to East Lancashire Golf Association, Lancashire Union of Golf Clubs or England Golf, and only with the express permission of their parent/guardian.

## Data Breaches

All Staff and Officials with access to data have been trained in their responsibilities.

All computers are password protected, with passwords changed on a 3 monthly basis

Computer	Scheduled Date of Password Change	Confirmed?
General Manager Office	30 <sup>th</sup> June 2018	
Competitions Office		
Ladies Lounge		
Professional Shop		
General Manager Office	30 <sup>th</sup> September 2018	
Competitions Office		
Ladies Lounge		
Professional Shop		
General Manager Office	31 <sup>st</sup> December 2018	
Competitions Office		
Ladies Lounge		
Professional Shop		
General Manager Office	31 <sup>st</sup> March 2019	
Competitions Office		
Ladies Lounge		
Professional Shop		

Each computer must have password protection in place to prevent unauthorised “logging on” A record is retained by the General Manager of those persons with access to the password and their reason for such use. There will be limited “file sharing” unless there is a business need to do so – e.g. staff records only available on the General Managers computer.

Computer information will be “backed up” as deemed appropriate and at least monthly. A copy of such back up record will be removed from the Club each day as protection should the original record be destroyed through fire/flood/theft.

In the event of a potential data protection breach, the person discovering the breach should report the breach to the General Manager, unless the breach has been made by the General Manager in which case the breach should be reported to the President.

The General Manager (or President) will then:

1. Inform the person(s) who are potentially affected, what data may have been breached, and to whom
2. Inform the ICO of the breach
3. Consider and investigate whether the breach can be prevented by again by reviewing procedures

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## **Data Protection by Design and Data Protection Impact Assessments**

It is unlikely that the Club will be impacted by this section of GDPR as primarily it focuses on:

- building new IT systems for storing or accessing personal data;
- developing legislation, policy or strategies that have privacy implications;
- embarking on a data sharing initiative; or
- using data for new purposes

In the event that the Club were to become involved in any of the above, it will familiarise itself with the ICO Code of Practice on Privacy Impact Assessments and latest guidance from Article 29 Working Party, working out how and when to implement it.

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## **Data Protection Officer**

The General Manager is the Data Protection Officer

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## **International**

This section of GDPR is not applicable to the Club

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