



## **General Data Protection Regulations Privacy Policy**

### **About this policy**

This policy explains when and why we, Les Mielles Ladies Golf Club, collect personal information about our members and visitors in open competitions, how we use it; keep it secure and club member's/visitors rights in relation to it. This includes probationary members, visitors and guests. We will collect, use and store personal data, as described in this Data Protection Privacy Policy (DPPP) when people engage in activities at the club. Normally this will be through some level of membership.

We reserve the right to amend this DPPP from time to time without prior notice. You are advised to check our Club notice board or website regularly for any amendments. We will only share your personal data with any third parties as outlined below.

We will always comply with the General Data Protection Regulation (GDPR) when dealing with your personal data. Further details on the GDPR can be found at the website for the Information Commissioner [www.jerseyoic.org](http://www.jerseyoic.org)

### **Responsible person**

For the purposes of the GDPR, The Club Membership Secretary will be the "controller" of all personal data we hold about club members and others. The Membership Secretary is responsible for making sure the club complies with the GDPR which applies from 25 May 2018. We will review personal data every year to establish whether we are still entitled to process it or not.

### **Specific use and sharing of personal information**

Your personal data (name, address, date of birth, gender, membership start/end dates, email address, telephone numbers) will be used for any appropriate notifications as required by law. In general, your personal data will only be used for the purposes of membership management (renewals etc.) and your email and telephone numbers may be used for communication about club news, competition entries/results and other important notices etc. Your name/address and email address may be shared with the Jersey Ladies Golf Association (JLGA). Your personal data will not be passed to anyone else outside the club and your email will only be given to someone outside the club with your permission.

### **The Lawful reasons for processing your data.**

We have two lawful reasons for processing your data, which are:

- (a) the administration of your membership contract,
- (b) receiving your consent to the processing of your data (as detailed above) by signing your membership renewal form on an annual basis.

The tables below give further explanation of which lawful reason applies to which data, why we collect it and who we may be required to share it with. The club will make every effort to ensure data is only shared with organisations that are GDPR compliant.

### **What Information we collect, why we collect it, and who we share it with**

In addition to the reasons stated below we may have to disclose your data where we have an inescapable legal obligation.

### **Data processed as a requirement of managing your membership**

The club will seek consent in the application form before processing any information as outlined below.

<b>Type of information</b>	<b>Purpose</b>	<b>Shared with</b>
Members', and guests'/visitors', addresses, telephone numbers, e-mail addresses	Managing the Members' membership of the Club and club insurance purposes.	Committee and associated working groups
Dates membership commenced and ended.	Managing the Member's membership of the Club.	
Date of birth / age related information.	Managing membership categories which are age related.	
Gender.	Provision of adequate facilities for members.	
Emergency contact details.	Contacting next of kin in the event of emergency.	Emergency services

The club may be asked to share personal information we process about an individual and the name, address and email address with the JLGA.

#### **Enquiries and other communications with the club**

When enquiring about the club we may hold your details for a period of time to deal with the enquiry. Any emails and other communications with the club will only be retained for a period of time appropriate to the content or request. Club emails will be purged on a regular basis. People added to a club waiting list for membership will be informed and asked for permission to store that data at that point.

#### **Children**

Parents or guardians signing the membership form are giving their permission for the data to be used as described elsewhere in this policy.

#### **How we protect your personal data**

The Data Controller will process membership information electronically and hold all information on a database on a secure computer and Club Systems for handicap purposes. If it is necessary to transport data it will be kept secure.

In the unlikely event of a breach of the security of data we will notify members promptly and we will never sell or pass on your personal data.

#### **Request to see your personal information**

If you wish to know what personal data the club holds please email the Membership Secretary and he/she will respond within 14 days of the request (depending on availability). Alternatively you can use the "contact us" section on the club website.

We will confirm all the personal details we hold on file for you that is contained within the membership record and Club Systems for playing and handicap purposes.

#### **Accuracy and retention of data**

Each individual member is responsible for keeping the Membership Secretary informed of changes to their data (e.g. address/telephone number etc.) and this is updated at least once a year at renewal and you are at that time authorising the club to hold such data on file.

The data will normally be kept for up to 10 years. It may be kept for a longer period for reasons of legal and civil action or other ongoing case management. Name, address and length of membership will be kept for up to 30

years for management of honorary memberships etc. Names and scores may be kept indefinitely for reason of historical significance – e.g. on trophies, plaques and other awards.

## **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.

You should note that some of these rights, for example the right to require us to transfer your data to another service provider or the right to object to automated decision making, may not apply as they have specific requirements and exemptions which apply to them and they may not apply to personal information recorded and stored by us. For example, we do not use automated decision making in relation to your personal data. However, some have no conditions attached, so your right to withdraw consent or object to processing for direct marketing are absolute rights.

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 UK or Jersey Information Commissioner's website at:

- <https://ico.org.uk/for-the-public/>
- [www.jerseyoic.org](http://www.jerseyoic.org)

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 "Contact us" section on our website.

If you are unhappy with the way we are using your personal information you can also complain to the Jersey Office of the Information Commissioner 2nd Floor, 5 Castle Street, St Helier, JE2 3BT. We are here to help and encourage you to contact us to resolve your complaint first.

Reviewed and updated in December 2020