

Carton House Men's and Ladies Golf Club data privacy notice

About Carton House Golf Club

Carton House Golf Club is a Private Members golf club operated on a privately owned site by an Operating Company owned by BHL Ltd. There are 2 Golf clubs in Carton House Golf Club (Mens and Ladies Golf Clubs) affiliated to the GUI/ILGU to run Members Golf events, Handicapping, Social events and other events as required by the membership. Both Golf clubs are run voluntarily by members for approximately 575 members. We process information about our Carton House Members in order to manage effectively our relationship with our members in the pursuit of Golf under the rules of the GUI/ILGU & R&A. Membership information is collected by BHL Ltd on admission to Carton House Golf Club (payment of fees) and this information is passed onto the relevant Golf club to enable the Club to organise Golf and social events associated with the golf club. We are committed to safeguarding the privacy of the personal information that is gathered concerning our prospective, current and past members for management of golf and social pursuits associated with Carton House Men's and Ladies Golf Club.

We respect your privacy

This privacy notice applies to the use of Personal Data by Carton House Men's and Ladies Golf Club. It explains what information we collect, how we use it, who we share it with and how we protect it. It also details the rights available to individuals in relation to how we hold and use their personal data, how to exercise those rights, and what to do if more information is required or a complaint is to be made.

This privacy notice applies to all personal data we hold in the context of sport and social participation relationship (Including subsidiaries utilised by Carton House Mens and Ladies Golf Club such as handicapping software, Golfnet, payment systems (Eventbrite etc.) and personnel who utilise information on Carton House members. For example, we may hold personal information about current and previous members and candidates for acceptance to the Men's and Ladies Golf Club.

Why we collect your Personal Data

We collect your personal data so that we can manage our relationships with you. Activities that we require personal data for include:

Management of our relationship with members as part of their membership of a Golf Club

Provision of membership related services to members, former members, visiting member

Provision of golf and social services to members

Responding to membership related requests and providing membership related information

A range of other membership related activities which we are obliged to undertake, or which we have gained your consent to perform

Fulfilment of obligations (e.g. GUI/ ILGU membership data and handicapping data)

We ensure that the information we collect is appropriate to the purposes for which it is obtained. We restrict the use of this information to ensure it is used for the purposes identified

We are committed to safeguarding the privacy of the personal information that we gather concerning our prospective, current and former members.

What Personal Data we collect

At Carton House Mens and Ladies Golf Club, we recognise the importance of Personal Data entrusted to us. We may collect and hold a range of information about you. Examples of the types of information we may hold include:

Personal identification information such as your name, address, gender, date of birth, memberships of other golf clubs, history of play, photographs etc.

Other information which you have provided to allow us to identify and contact you

Any declaration re previous memberships, handicapping, code of conduct or issue associated with membership of a golf club in the pursuit of golf and ancillary activities run by the club from time to time.

Details that you have provided about your emergency contact(s), next of kin (part of junior membership)

Membership identifiers such as Carton House Members number or business email address that you have provided, or have been assigned

Information you have provided in your membership application, including details about your past membership history

Information about memberships of groups or societies (e.g. other golf club, society membership, Carton House Members sports and social club membership) that you have provided to facilitate us processing your membership

Information that you have consented to provide as part of our equal opportunities or diversity & inclusion programmes

Photographic images used for security and identification information or for use in internal and external publications

CCTV/video images captured for social and sporting purposes (event participation, team membership, coaching or other)

Copy of handicap certs, medical certs for handicapping amendment purposes, for use of buggies in approved competitions purposes

Copy of passport and travel visas for teams competing overseas

Banking details that you have provided to facilitate electronic payments for events

Other medical data that you choose to share with us to provide additional supports in pursuit of golf at carton (Unable to complete a round of golf and reason to not be able to represent carton in interclub events at short notice)

Golf history and performance data that is collected as part of our golf performance review activities including, where appropriate, disciplinary and grievance records

Correspondence with or about you, for example a letter to GUI/ILGU or away club re golf performance at Carton

Information regarding your use of Carton House Golf Club equipment

Personal email addresses for use in specific situations (AGM, EGM etc)

In some cases, we may collect information about your activity and use of Carton House Mens / Ladies Golf Club systems in the context of Carton House Mens and Ladies Golf Club has access to Golfnet, website, internet or intranet usage or the use of social media used by the club to deliver the contract of membership of Carton House Mens or Ladies golf club. In these cases, your information will be collected and used strictly in accordance with the contract of membership.

Most of the information we hold will have been provided directly by you, but it may also come from other sources, such as external sources (away clubs, GUI/ILGU, Golf agencies or other golf club memberships and reports of play from outside agencies e.g.: members of away clubs, reports from away clubs, open access golf information databases (HowDidIDo, etc.)

How we use your Personal Data

We use personal data for the management and performance of your contract of membership. The following are the main ways that personal data may be used:

Processing in relation to Membership, Playing of Golf, Competitions, Handicaps and social events.

For moving from one membership type to another and between membership status on the system

To manage handicaps according to the rules of Golf and CONGU

For Performance and Development activities such as goals setting, golf development plans, coaching lists, Team lists

To validate eligibility to be covered by Carton House Mens and Ladies Golf Club insurance policies

Conduct Carton House Members Surveys

In the development, monitoring and enforcement of Carton House Golf Club policies, Rules and guidelines.

In addition, Carton House Mens and Ladies Golf Club operates and offers a range of services that are available to members as required, or as part of the management of golf related procedures. The following are the main ways that personal data may be used when delivering these services:

Processing of personal supplied data related to physical health to allow management of a medical case by a member to gain approval to adjust handicap with the GUI / ILGU

Processing of personal data of current or former members as part of an assessment of eligibility to receive Carton House Mens and Ladies Golf Club events (past team members, Past Captains, past winners etc)

Processing of data to facilitate information regarding the scheduling of golf events and/or delivery of services that are periodically offered to members (fitting days, private members promotions).

Processing of data to facilitate delivery of vouchers or other that are periodically offered to members

Processing of data related to mandatory handicap assessments undertaken by members as part of handicap review.

Processing of personal data through digital tools offered to members to help them manage their golf and social events associated with Carton House Mens and Ladies Golf Club membership (targeted offers, events such as: coaching ideas, promotions through Carton, other offers associated with being a member of Carton (clubs, tools, outings, clinics, tastings, etc.)

Activities that require your consent

In order for us to carry out certain activities outside the above parameters using your personal data, we may need to ask for your consent. When consent is being requested, we will provide you with relevant options, such as the choice of whether we may contact you by phone, post, email, text or through other digital media.

Where we require consent, we will explain why and provide sufficient information to allow you to make an informed decision.

When we have been provided with consent to perform such activities, that consent may be withdrawn at any time by contacting us requesting its removal.

Should there be any reason for us to collect sensitive personal information (e.g. medical data) other than as outlined in your contract of membership, we ask for consent to collect it. Before consent is given, we explain what information will be collected and what we will use it for. Again, this consent can be withdrawn by contacting us.

Parties with whom we share information

We may share your personal data with, or disclose your personal data to, the following categories of third party:

1. Your approved 3rd parties: where you have notified us that you wish us to provide information or payments to 3rd parties such as **Carton House PLC** organisation we will share the required information in accordance with your instructions.
2. Agents or suppliers: these are persons or companies we have contracts with to provide products or services that we use in conducting our business, including managing our relationship with our members. In some cases they may be outside of the EEA. We will only share or disclose to these parties the information that they need in order to provide the products or services, and will require those parties to ensure that the information is always adequately protected.
3. Other external bodies: we are required to disclose personal data to external bodies, such as the GUI/ILGU, Golfnet, HowDidIDo, in order to deliver on your membership of carton in the pursuit of golf. In these cases, we will only disclose the minimum amount of information required to satisfy this obligation. However, once the information is disclosed, we will not be able to control how it is used by those bodies. You can at any time access this data bank (Golfnet, ClubV1, HowDidIDo, and amend or delete this information as

required). However minimum information is required to ensure your ability to play golf is maintained.

How we protect it - Security of your Personal Data

We keep our computer systems, files and buildings secure by following legal requirements and international security guidance. We make sure that our Carton House Members, and anyone with access to personal data that we are responsible for, is trained on how to protect personal data (data usage matrix and policy). We ensure that our processes clearly identify the requirements for managing personal data and that they are up to date. We regularly audit our systems and processes to ensure that we remain compliant with our policies and legal obligations.

Our use of Cookies

Our Intranet uses 'cookies' to help us provide users with a better experience each time they visit. A cookie is a small piece of text that is placed directly on a device when it is used to visit a website. This helps to give the user a better experience when using the website. The information gathered by the cookie stays on the users' devices.

We use information gathered from cookies to help improve users experience on our website, for security and to personalise content and advertising. For example, cookies help us to identify that the device has visited our site before, allowing us to customise the experience based on previous browsing history. It also helps us to determine the most relevant information to show that user when they are browsing. Further information about the type of cookies that we use and their purpose is available in the cookies policy on the Carton House Members Golf Club website.

We do not use cookies to gather any personal data for storage on our systems. The user can delete the cookie and the information that it gathers at any time using the settings in their Internet web browser.

How long we keep data

Information collected by us will be held for as long as it is required to fulfil the purpose it was collected. We are required to keep certain types of information for a specific period of time in order to comply with GUI/ILGU/CONGU Rule requirements. Beyond this time we will delete /dispose of this information. Information within systems under your own control (HowDidIDo etc, and other golf apps joined and data entered by yourself are not within the Clubs control).

The length of time we keep any part of your personal information will depend on the type of information and the purpose for which it was obtained (for golfing purposes this is 2 years of data prior to the current year).

How we address your rights

Although Carton House Mens and Ladies Golf Club needs to gather, store and process your personal information in order to carry out a range of services, you have a range of rights available to you to give you confidence that your information is appropriately managed. Detailed information about your rights, when they apply and our responsibilities to you are available on our website.

The rights that you have available to you include:

Gaining access to and copies of your personal data: you are entitled to receive, on request and free of charge, a copy of all your personal data that we hold. There are some limitations to this right. For example, if the data also relates to another person and we do not have that person's consent, or if the data is subject to legal privilege. Where there is data that we cannot disclose, we will explain this to you.

Ensuring that your data is accurate: our aim is to ensure that the data we hold about you is correct and up to date. From time to time we may contact you to verify the information that we hold. You may also contact us to correct any errors that you notice.

Granting or Removing consent: where we require your consent for any processing, for example, to provide you with direct marketing communications, we will clearly explain what the consent is for, and any consequences of giving or refusing consent, and will provide that consent can only be given by way of a positive action by you. We will also ensure that you are able to withdraw any such consent at any time.

Restricting processing of your data: you have the right to request us to restrict the processing of your personal data in certain circumstances, for example, if there is a dispute over our rights to carry out specific processing activities, or where you do not want us to delete data. We will respond promptly to your request and will provide an explanation if we cannot fully comply.

Deletion of your data: in certain circumstances, you may have the right to have some or all of your personal data deleted from our records. This is sometimes referred to as the "right to be forgotten". This may occur if, for example, we retain data which is no longer required by us, or if you withdraw a consent. If you continue to have a relationship with us, we must retain the data we need to

manage this relationship. We will respond promptly to your request, and provide reasons if we object to the deletion of any of your personal data.

Moving your data: where it is possible for us to provide it, you have the right to receive a digital copy of the personal data that you have provided to us.

International Transfers of Data: in certain circumstances, we may transfer your personal information internationally, including outside of the European Economic Area (EEA). Should we do this, we ensure that all transfers are made in accordance with data protection law and that your data it will be given an equivalent level of protection that it has when it is being managed in Ireland.

How to contact us

In relation to Personal Data Individuals have the right to be informed, the right of access, the right to rectification, the right of erasure, the right to restrict processing, the right to Data Port, the right to withdraw consent and rights in relation to automated decision making and profiling. The collection and use of your data by Carton House Mens and Ladies Golf Club is overseen by the **Carton House Mens Golf Club Data Protection Officer (Mens Club Hon Secretary)**. If you have any queries or comments about this privacy notice, or about the way we use and protect your personal data the Data Protection Officer can be contacted by email to **mensclub@cartonhousemembers.com** or by postal mail to **Data Protection Officer, Carton House Mens Golf Club**, Carton Demesne. Maynooth, County Kildare

How to make a complaint

If for any reason you have a complaint about our use of your personal information, or you are unhappy in any way with the information we provide to you, we would like you to contact us directly so that we can address your complaint. You can contact us by email at **mensclub@Cartonhousemembers.com** or by postal mail to **Data Protection Officer, Hon Secretary, Carton House Mens Golf Club**, Maynooth, Co Kildare. You may also contact the Data Protection Commission in Ireland about such matters on 1890 252 231, by email at info@dataprotection.ie or by postal mail at Data Protection Commission, Canal House, Station Road, Portarlington R32 AP23, Co. Laois

Further information on systems used by the Mens and Ladies Club are available on the following sites.

HowDidIDo.com ClubV1.com Golfnet.com