



# Flempton Golf Club

*A heathland course in the heart of Suffolk*

## PRIVACY NOTICE

Flempton Golf Club take your privacy very seriously.

This Privacy Notice sets out how we use and look after the personal information we collect from you. We are the data controller, responsible for the processing of any personal data you give us. We take reasonable care to keep your information secure and to prevent any unauthorised access to or use of it.

### What personal data we hold on you

Personal data means any information about an individual from which that individual can be identified. We collect, use, store and transfer some personal data of our participants [and their parents or guardians], and other Club members.

You provide information about yourself when you register with the Club, and by filling in forms at an event or online, or by corresponding with us by phone, e-mail or otherwise.

The information you give us may include your name, date of birth, address, e-mail address, phone number, gender, and the contact details of a third party in the case of emergency. We may also ask for relevant health information, which is classed as special category personal data, for the purposes of your health, wellbeing, welfare and safeguarding. Where we hold this data will be with the explicit consent of the participant or, if applicable, the participant's parent or guardian.

Where we need to collect personal data to fulfil Club responsibilities and you do not provide that data, we may not be able to honour or administer your membership.

### Why we need your personal data

We will only use personal data for any purpose for which it has been specifically provided.

The reason we need participants' and members' personal data is to be able to run the golf club and arrange matches; to administer memberships, and provide the membership services you are signing up to when you register with the club. Our lawful basis for processing your personal data is that we have a contractual obligation to you as a participant or member to provide the services you are registering for.

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

<b>Purpose/ Processing Activity</b>	<b>Lawful Basis for processing under Article 6 of the GDPR.</b>
Processing membership forms and payments/ subs	Performance of a contract
Processing handicaps.	Performance of a contract
Organising matches	Performance of a contract
Sending out match or Club information and updates	Performance of a contract
Sharing data with officials, team or organisers, or pros to run coaching sessions and enter events.	Performance of a contract

Sharing data with leagues we are in membership of, county associations and other competition providers for entry in events	Performance of a contract
Sharing data with club officials and activity organisers to provide information about club activities, membership renewals or invitation to social events	The Club has a legitimate interest to maintain member and participant correspondence for club community purposes.
Sharing data with third party service or facility providers	The Club has a legitimate interest to run the organisation efficiently and as it sees fit. Provision of some third-party services is for the benefit of the Club, participants and its members.
Sharing anonymised data with a funding partner as condition of grant funding e.g. Local Authority	The Club has a legitimate interest to run the organisation efficiently and as it sees fit. Application for funding is a purpose that benefits the Club, participants and its members.
Publishing match and league results	Consent. We will only publish your personal data in a public domain, including images and names, if you have given your consent for us to do so. In the case of children under the age of 13 then only with written consent of parent/guardian.
Sending out marketing information such as newsletters and information about promotions and offers from sponsors	Consent. We will only send you direct marketing if you are an existing member, participant or other associated individual and you have not previously objected to this marketing, or, you have actively provided your consent.
To ensure we understand possible health risks	Consent. We will only process details on your medical history with your consent.

### **Who we share your personal data with**

When you become a member of the Club, your information is entered onto the ClubV1 and HowDidIDo databases, which are administered by the Club Systems International Ltd. For handicap administration purposes ClubV1 and HowDidIDo pass on data to England Golf. Accounting details are maintained with Xero online accounting software (Xero Ltd). We also pass your information to England Golf, The Suffolk Golf Union and affiliated bodies and to leagues to register participants and the team for matches, tournaments or other events, and for affiliation purposes.

We may share your personal data with selected third parties, suppliers and sub-contractors such as referees, coaches or match organisers. Third-party service providers will only process your personal data for specified purposes and in accordance with our instructions.

We may disclose your personal information to third parties to comply with a legal obligation; or to protect the rights, property, or safety of our participants, members or affiliates, or others.

### **Protection of your personal data**

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed.

### **How long we hold your personal data**

We keep personal data on our participants and members while they continue to be a participant or member or are otherwise actively involved with the Club. We will delete this data 12 months after a participant or member has left or otherwise ended their membership or affiliation, or sooner if specifically

requested and we are able to do so. We may need to retain some personal data for longer for legal or regulatory purposes. The personal data that is stored on Howdidido and England Golf is subject to their privacy policy so we advise you review that policy together with this notice. If you would like your personal data to be deleted from Howdidido and/ or England Golf then please contact them.

### **Your rights regarding your personal data**

As a data subject you may have the right at any time to request access to, rectification or erasure of your personal data; to restrict or object to certain kinds of processing of your personal data, including direct marketing; to the portability of your personal data and to complain to the UK's data protection supervisory authority, the Information Commissioner's Office about the processing of your personal data.

As a data subject you are not obliged to share your personal data with the Club. If you choose not to share your personal data with us we may not be able to register or administer your membership.

We may update this Privacy Notice from time to time and will inform you to any changes in how we handle your personal data.

If you have any questions about this Privacy Notice, then please contact the club's Data Protection Officer.

### **Key details**

- Policy prepared by: Bob Cooper & Sarah Brownie
  - Approved by the Council on: 01/05/2018
  - Policy became operational on: 02/05/2018
- Updated in line with the introduction of WHI 30/09/2020  
Next review date: 30/09/2021