

Weymouth Golf Club Privacy Policy



Data Privacy Policy

We are committed to respecting your privacy, ensuring it is protected and secure. Please be assured any information by which you can be identified will only be used in accordance with this policy. This policy applies to you if you have registered to become or are a member of our club. This policy explains how we comply with the law on data protection, what your rights are and for the purposes of data protection we will be the controller of any of your personal information.

1. About this Policy

1.1 This policy explains when and why we collect personal information about our staff, workers, Directors, volunteers, members, guests, and the Club Professional, how we use it and how we keep it secure and your rights in relation to it.

1.2 We may collect, use and store your personal data, as described in this Data Privacy Policy and as described when we collect data from you.

1.3 We reserve the right to amend this Data Privacy Policy from time to time without prior notice. You are advised to check our website <http://weymouthgolfclub.co.uk> or our Club noticeboard regularly for any amendments (but amendments will not be made retrospectively).

1.4 We will always comply with the General Data Protection Regulations (GDPR) when dealing with your personal data. Further details on the GDPR can be found at the website for the Information Commissioner (www.ico.gov.uk). For the purposes of GDPR, we will be the “controller” of all personal data we hold about you.

1.5 Data protection law is a complex area. This Policy has been designed to ensure that you are aware of the legal requirements imposed on you and on us and to give you practical guidance on how to comply with them. This Policy also sets out the consequences of failing to comply with these legal requirements. However, this Policy is not an exhaustive statement of data protection law or of your responsibilities in relation to data protection.

If at any time you have any queries about this Policy, your responsibilities or any aspect of data protection law, seek advice. Contact your line manager or the Clubs Data Protection Officer – Mr Steven Dewey.

2. Who are we ?

2.1 We are Weymouth Golf Club Limited trading as Weymouth Golf Club, a limited company (registration number 00842093) and will be what's known as the 'Controller' of the personal data that you provide to us.

We can be contacted at: Weymouth Golf Club, Links Road, Weymouth DT4 0PF

Tel: 01305 750831 Email: weymouthgolfclub@gmail.com

3. Who is responsible for data protection

- All our workers are responsible for data protection, and each persona has their role to play to make sure that we are compliant with data protection laws.
- We are required to appoint a Data Protection Officer (DPO). Details of our current DPO can be found on the Information Commissioners website and they can be reached at - Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF Telephone Number - 0303 123 1113 - <https://ico.org.uk/concerns/>

4 . Why do we have a data protection policy

- We recognise that processing of individuals' personal data in a careful and respectful manner, cultivates a trusting relationship with those individuals, including our members, and trust in our brand. We believe that such relationships will enable our organisation to work more effectively with and to provide a better service to those individuals.
- This Policy works in conjunction with any other policies implemented by us from time to time.

5. Status of this Policy and the implications of breach.

5.1 Any breaches of this Policy will be viewed very seriously. All workers must read this Policy carefully and make sure they are familiar with it. Breaching this Policy is a disciplinary offence and will be dealt with under our Disciplinary Policy.

5.2 If you do not comply with Data Protection Laws and/or this Policy, then you are encouraged to report this fact immediately to the DPO. This self-reporting will be taken into account in assessing how to deal with any breach, including any non-compliance which may pre-date this Policy coming into force.

5.3 Also if you are aware of or believe that any other representative of ours is not complying with Data Protection Laws and/or this Policy you should report it in confidence to the DPO.

6. Other Consequences

6.1 There are a number of serious consequences for both yourself and us if we do not comply with Data Protection Laws. These include :

For You

- **Disciplinary action:** If you are an employee, you're your terms and conditions of employment require you to comply with our policies. Failure to do so could lead to disciplinary action including dismissal. Where you are a volunteer, failure to comply with our policies could lead to termination of your volunteering position with us.
- **Criminal sanctions:** Serious breaches could potentially result in criminal liability.
- **Investigations and interviews:** Your actions could be investigated and you could be interviewed in relation to any non-compliance.

For the Club

- **Criminal sanctions:** Non-compliance could involve a criminal offence.
- **Civil Fines:** These can be up to Euro 20 million or 4% of our turnover whichever is higher.
- **Assessments, investigations and enforcement action:** We could be assessed or investigated by, and obliged to provide information to, the Information Commissioner on its processes and procedures and/or subject to the Information Commissioner's powers of entry, inspection and seizure causing disruption and embarrassment.
- **Court orders:** These may require us to implement measures or take steps in relation to, or cease or refrain from processing personal data.
- **Claims for compensation:** Individuals may make claims for damage they have suffered as a result of our non-compliance.
- **Bad publicity:** Assessments, investigations and enforcement action by, and complaints to, the Information Commissioner quickly become public knowledge and might damage our brand. Court proceedings are public knowledge.
- **Loss of business:** Prospective members, participants, players, customers, suppliers and contractors might not want to deal with us if we are viewed as careless with personal data and disregarding our legal obligations.
- **Use of management time and resources:** Dealing with assessments, investigations, enforcement action, complaints, claims and such matters takes time and effort and can involve considerable cost.

7. Data Protection Laws

7.1 This policy is in line with the General Data Protection Regulation (GDPR) and the Data Protection Act 2018. After Brexit it is anticipated the UK will adopt laws equivalent to the Data Protection Laws.

7.2 The Data Protection Laws all require that the personal data is processed in accordance with the Data Protection Principles (see below) and gives individuals rights to access, correct and control how we use their personal data (see below).

8. How & what information we collect and why ?

We typically collect personal information about our members when you apply to become a member of the club. Depending on the type of membership you register for with us, you may initially provide us, with or we may obtain personal information about you when you purchase any services or products we offer, when you make an enquiry and/or a complaint or when you correspond with us by phone, email or in some other way.

8.1 How information is collected from you ?

Who this policy applies too:

This policy applies to both members, guests, and visitors. These terms have the following meanings;

- Members: anyone that receives our services, provided directly by us, and has the ability to log in to the Members area.
- Guests: any guest of the Club or member that receives our services, provided directly by us.
- Visitors: any visitor to the Club who receives our services, provided directly by us.

8.2 Membership Application Forms / Open Competition Entry Forms / Contact Forms

When you contact us about our products and services, we will request personal details such as your name, telephone number, address, email address, age, gender but only if it is relevant to the service you are requesting. Details of the type of personal information we use, the reason why and the lawful basis for being able to do so can be found in the table below.

Personal Information used	Purpose	Lawful Basis
All contact and membership details such as name, address, age, date of birth, telephone numbers, email addresses & social media IDs. Transaction and payment information, records of your interactions with us and marketing preferences.	To administer any membership you have with us and managing our relationship with you, including dealing with payments and any support, service or product enquiries made by you. To arrange and manage any contracts for the provision of any services or products.	This is necessary to enable us to properly manage & administer your membership contract with us.
Contact and membership details.	To send you information which is included within your membership benefits package, including details about competitions, events, partner offers and discounts and any updates on golfing events.	This is necessary to enable us to properly manage & administer your membership contract with us.
Contact details and records of your interactions with us.	To answer your queries or complaints.	We have a legitimate interest to provide complaint handling services to you in case there are any issues with your membership.

<p>All the personal information we collect.</p>	<p>To gather evidence for possible grievance or disciplinary hearings.</p>	<p>We have a legitimate interest in doing so to provide a safe and fair environment for all members and to ensure the effective management of any disciplinary hearings, appeals and adjudications.</p> <p>We process “special category reasons for processing of your personal data” referred to above.</p> <p>For criminal records history we process it on the basis of legal obligations or based on your explicit consent.</p>
<p>Records of your attendance at any events or competitions hosted by us.</p>	<p>To conduct data analytics studies to better understand event attendance and trends within the sport</p>	<p>We have a legitimate interest in doing so to ensure that our membership is targeted and relevant.</p>
<p>Details of next of kin, family members and emergency contacts, health and medical information.</p>	<p>To arrange for any trip or transportation to and from an event</p>	<p>This is necessary to enable us to make the appropriate arrangement for the trip and/or to an event.</p> <p>We process special category personal data on the basis of the “special category reasons for processing of your personal data” referred to above.</p>
<p>Your usage of our IT systems and online.</p>	<p>The security of our IT systems</p>	<p>We have a legitimate interest to ensure that our IT systems are secure.</p>
<p>Information about your criminal convictions and offences</p>	<p>To comply with legal obligations, for example, regarding people working with children or vulnerable adults to comply with our safeguarding requirements.</p>	<p>For criminal records history we process it on the basis of legal obligations or based on your explicit consent.</p>

<p>Records of attendance, and CCTV footage and other information obtained through electronic means such as swipecard records, medical information about your health.</p>	<p>To comply with Health and safety requirement</p>	<p>We have a legal obligation and a legitimate interest to provide you and other members of our Club with a safe environment in which to participate in sport. We process special category personal data on the basis of the “special category reasons for processing of your personal Data” referred to above. For criminal records history we process it in the basis of legal obligations or based on your explicit consent.</p>
<p>All the personal information we collect.</p>	<p>Retention of records.</p>	<p>We have a legitimate interest in retaining records whilst they may be required in relation to complaints or claims. We need to retain records in order to properly administer and manage your membership and operate our Club and in some cases we may have legal or regulatory obligations to retain records. We process “special category reasons for processing of your personal data” referred to above. For criminal records history we process it on the basis of legal obligations or based on your explicit consent.</p>
<p>Bank Account details of the member or other person making payments to the Club via BACS or Cardnet Services.</p>	<p>To manage the members subscription instalments to the Club and the provision of card payments.</p>	<p>To manage & administer the Club’s agreement with the member which is our legitimate interest in operating the Club.</p>
<p>Contact details and Marketing preferences.</p>	<p>To send you other marketing information we think you might find useful or which you have requested from us, including our newsletters, information about membership and events.</p>	<p>When you have given us your explicit consent to do so.</p>

9. Special category data

9.1 Special category data under the Data Protection Laws is personal data relating to an individual's race, political opinions, health, religious or other beliefs, trade union records, sex life, biometric data and genetic data.

9.2 Under Data Protection Laws this type of information is known as special category data and criminal records history becomes its own special category which is treated for some parts the same as special category data. Previously these types of personal data were referred to as sensitive personal data and some people may continue to use this term.

9.3 To lawfully process special categories of personal data we must also ensure that either the individual has given their explicit consent to the processing or that another of the following conditions has been met:

- the processing is necessary for the performance of our obligations under employment law;
- the processing is necessary to protect the vital interests of the data subject. The ICO has previously indicated that this condition is unlikely to be met other than in a life or death or other extreme situation;
- the processing relates to information manifestly made public by the data subject;
- the processing is necessary for the purpose of establishing, exercising or defending legal claims; or
- the processing is necessary for the purpose of preventative or occupational medicine or for the assessment of the working capacity of the employee;

9.4 To lawfully process personal data relating to criminal records and history there are even more limited reasons, and we must either:

- ensure that either the individual has given their specific consent to the processing; or
- ensure that our processing of those criminal records history is necessary under legal requirement imposed upon us.

9.5 We would normally only expect to process special category personal data or criminal records history data usually in a Human Resources context.

10. How we protect your personal data

10.1 We will not transfer your personal data outside the EU without your consent.

10.2 We have implemented generally accepted standards of technology and operational security, in order to protect personal data from loss, misuse, or unauthorised alteration or destruction.

10.3 Please note however that where you are transmitting information to us over the internet/email this can never be guaranteed to be 100% secure.

10.4 We will notify you promptly in the event of any breach of your personal data which might expose you to serious risk.

11. Data protection principles

The Data Protection Laws set out 6 principles for maintaining and protecting personal data, which form the basis of the legislation. All personal data must be:

- processed lawfully, fairly and in a transparent manner and only if certain conditions are met;
- collected for specific, explicit and legitimate purposes, and not processed in any way incompatible with those purposes (“purpose limitation”)
- adequate and relevant, and limited to what is necessary to the purposes for which it is processed (“data minimisation”)
- accurate and where necessary kept up to date
- kept for no longer than is necessary for the purpose (“storage limitation”)
- processed in a manner that ensures appropriate security of the personal data using appropriate technical and organisational measures (“integrity and security”)

12. Who else has access to the information you provide us ?

12.1 We will never sell your personal data. We will not share your personal data with any third parties without your prior consent (which you are free to withhold) except where required to do so by law or as set out in the table above.

12.2 We will share limited membership data with specific third parties who adhere to the principles and rules of GDPR. These are Site Wizard (for the purposes of the Club website), Club Systems International Limited (includes Club V1 & HowDidiDo for the purpose golf membership, benefits including information, competitions, events and any updates on golf), NBC Universal (administering BRS Golf & GolfNow), TGI Golf Partnership & Golf Matters Limited (for the purpose of advising the membership as to our golf professional’s services), and England Golf (for the administering your handicap under the World Handicap System). We only disclose the personal data that is necessary for these third parties to deliver their services to you, the member.

12.3 The personal information we collect may be transferred to and stored in countries outside of the UK and the European Union. Some of these jurisdictions require different levels of protection in respect of personal information and, in certain circumstances, the laws in those countries may be less protective than the jurisdiction you are typically resident in. We will take all reasonable steps to ensure that your personal information is only used in accordance with this privacy notice and applicable data protection laws and is respected and kept secure and where a third party processes your data on our behalf we will put in place appropriate safeguards as required under data protection laws. For further details please contact us by using the details set out in the “Contacting Us” section below.

13. How long do we keep your information ?

13.1 We will not store your personal information for any longer than we need to, however we will hold your personal data on our systems for as long as you are a member of the Club and for as long afterwards as is necessary to comply with our legal obligations. We will review your personal data every year to establish whether we are still entitled to process it. If we decide that we are not

entitled to do so, we will stop processing your personal data. However, we will retain your personal data in an archived form in order to be able to comply with future legal obligations e.g. - compliance with tax requirements and exemptions, and the establishment exercise or defence of legal claims.

13.2 As a guest or visitor, if you purchase any products and services from us (e.g. green fees), then under UK tax law we are required to keep your basic personal data (name, address, contact details) for a minimum of 6 years after which time it can be erased on your request.

13.3 We securely destroy all financial information once we have used it and no longer need it or until you notify us that you no longer wish us to do so unless your request contradicts our statutory obligations.

14. Website Use

14.1 Google Analytics

When someone visits our website, we use a third-party service, Google Analytics, to collect standard internet log information and details of visitor behaviour patterns. We do this to find out things such as the number of visitors to the various parts of the site. This information is only processed in a way which does not identify anyone. We do not make, and do not allow Google to make, any attempt to find out the identities of those visiting our website. If we do want to collect personally identifiable information through our website, we will be up front about this. We will make it clear when we collect personal information and will explain what we intend to do with it.

14.2 Use of 'cookies'

Please be aware that our website uses cookies. If you haven't heard of 'Cookies' before, they are small pieces of information sent by a website and stored on your hard drive. Our website uses 'Cookies' to collect statistical data about your browsing actions and preferences. For example, cookies may be used to store your language preference on our website. Please be aware that our 'Cookies' do not identify you as an individual, until you have contacted us through our website. It is possible to configure or completely switch off 'Cookies' by changing your browser preferences.

15. CCTV

Weymouth Golf Club uses closed circuit television (CCTV) images to provide a safe and secure environment for members, employees and for visitors to the Clubhouse & premises. The Club's CCTV facility records images only.

15.1 Purposes of CCTV

The purposes of the Club installing and using CCTV systems include:

- To assist in the prevention or detection of crime or equivalent malpractice.
- To assist in the identification and prosecution of offenders.
- To monitor the security of the Club's Clubhouse & premises.
- To ensure that health and safety rules and Club procedures are being complied with.

15.2 Location of cameras

No camera focuses, or will focus, on toilets, shower facilities, changing rooms, staff kitchen areas, staff break rooms or private offices. Appropriate signs are prominently displayed so that members, employees, and visitors are aware they are entering an area covered by CCTV.

15.3 Recording and retention of images

Images may be recorded either in constant real-time (24 hours a day throughout the year), or only at certain times, as the needs of the business dictate.

As the recording system records digital images, any CCTV images that are held on the hard drive of a PC or server are deleted and overwritten on a recycling basis and, in any event, are not held for more than one month. Once a hard drive has reached the end of its use, it will be erased prior to disposal.

Images that are stored on, or transferred on to, removable media such as CDs are erased or destroyed once the purpose of the recording is no longer relevant. In normal circumstances, this will be a period of one month. However, where a law enforcement agency is investigating a crime, images may need to be retained for a longer period.

15.4 Access to and disclosure of images

Access to, and disclosure of, images recorded on CCTV is restricted. This ensures that the rights of individuals are retained. Images can only be disclosed in accordance with the purposes for which they were originally collected.

The images that are filmed are recorded centrally and held in a secure location. Access to recorded images is restricted to the operators of the CCTV system and to those line managers who are authorised to view them in accordance with the purposes of the system. Viewing of recorded images will take place in a restricted area to which only nominated employees and/or directors will have access when viewing is occurring. If media on which images are recorded are removed for viewing purposes, this will be documented.

Disclosure of images to other third parties will only be made in accordance with the purposes for which the system is used and will be limited to:

- The police and other law enforcement agencies, where the images recorded could assist in the prevention or detection of a crime or the identification and prosecution of an offender or the identification of a victim or witness.
- Prosecution agencies, such as the Crown Prosecution Service.
- Relevant legal representatives.
- Individuals whose images have been recorded and retained (unless disclosure would prejudice the prevention or detection of crime or the apprehension or prosecution of offenders).

16. Your rights

16.1 You have rights under the GDPR:

- a) to access your personal information we hold about you
- b) to be provided with information about how your personal information is processed
- c) to request the correction of inaccurate personal information
- d) to have your personal information erased in certain circumstances
- e) to object to or restrict how your personal information is processed
- f) to request your personal information be transferred to yourself or to another service provider
- g) to object to certain automated decision-making processes using personal information

16.2 The exercise of these Rights may be made in writing, including email, and also verbally and should be responded to in writing by us (if we are the relevant controller) without undue delay and in any event within one month of receipt of the request. That period may be extended by two further months where necessary, taking into account the complexity and number of requests. We must inform the individual of any such extension within one month of receipt of the request, together with the reasons for the delay.

16.3 Where the data subject makes the request by electronic form means, any information is to be provided by electronic means where possible, unless otherwise by the individual.

16.4 If we receive the request from a third party (e.g. a legal advisor), we must take steps to verify that the request was, in fact, instigated by the individual and that the third party is properly authorised to make the request. This will usually mean contacting the relevant individual directly to verify that the third party is properly authorised to make the request.

16.5 There are very specific exemptions or partial exemptions for some of these Rights and not all of them are absolute rights. However, the right to not receive marketing material is an absolute right, so this should be complied with immediately.

16.6 Where an individual considers that we have not complied with their request e.g. exceeded the time period, they can seek a court order and compensation. If the court agrees with the individual, it will issue a Court Order, to make us comply. The Court can also award compensation. They can also complain to the regulator for privacy legislation, which in our case will usually be the ICO.

16.7 In addition to the rights discussed in the document, any personal may ask the ICO to assess whether it is likely that any processing of personal data has or is being carried out in compliance with privacy legislation. The ICO must investigate and may serve an "Information Notice" on us (if we are the relevant data controller). The result of the investigation may lead to an "Enforcement Notice" being issued by the ICO. Any such assessments, information notices or enforcement notices from the ICO should be sent directly to our DPO.

16.8 In the event of a worker receiving such a notice, they must immediately pass the communication to our DPO.

16.9 Erasure of data

You have a right to have your personal data erased to prevent processing in the following specific circumstances:

- Where the personal data is no longer necessary in relation to the purposes for which it was originally collected/processed.
- If you wish to withdraw consent.

- If you object to the processing and there is no overriding legitimate interest for continuing the processing.
- The data was unlawfully processed in accordance with the GDPR.
- The personal data must be erased, in order, to comply with a legal obligation.
- The personal data is processed in relation to the offer of information society services to a child.

16.10 Keeping your information secure

To help keep your information confidential you should:

- Keep your passwords secret.
- Never distribute the website addresses for pages that you have looked at while logged in as a registered member or visitor.
- Choose a password that is not obvious or known to anyone else.
- Never give a third party your password, as you will be responsible for all activity and charges incurred through use of your password whether authorised by you or not.

If you forget your password, you can request a new password, which will be emailed to the address we hold for you. You can change your password anytime through the ClubV1, HowDidiDo and BRS websites. Should we think that there is likely to be, or has been any breach of security, we may change your password and notify you of the change by email.

16.11 You have the right to take any complaints about how we process your personal data to the Information Commissioner: <https://ico.org.uk/concerns/>

Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF
Telephone Number - 0303 123 1113

If you require any more details, have any questions, comments, concerns or requests regarding our data processing practices please contact us at weymouthgolfclub@gmail.com

17. Employees (current & former) and Job Applicants

We are the data controller for the information you provide during the process unless otherwise stated. If you have any queries about the process or how we handle your information, please contact us at weymouthgolfclub@gmail.com

17.1 How we will use the information you provide to us ?

All the information you provide during the process will only be used for the purpose of progressing your application, or to fulfil legal or regulatory requirements if necessary.

We will not share any of the information you provide during the recruitment process with any third parties for marketing purposes or store any of your information outside of the European Economic Area. The information you provide will be held securely by us and/or our data processors whether the information is in electronic or physical format.

We will use the contact details you provide to us to contact you to progress your application. We will use the other information you provide to assess your suitability for the role you have applied for.

17.2 What information we collect and, why ?

We do not collect more information than we need to fulfil our stated purposes and will not retain it for longer than is necessary.

The information we ask for is used to assess your suitability for employment. You don't have to provide what we ask for, but it might affect your application if you don't.

17.3 Employment offers

If we make a conditional offer of employment, we will ask you for information so that we can carry out pre-employment checks. You must successfully complete pre-employment checks to progress to a final offer. We are required to confirm the identity of our staff, their right to work in the United Kingdom and seek assurance as to their trustworthiness, integrity, and reliability.

You will therefore be required to provide:

Proof of your identity – you will be asked to attend our office with original documents, we will take copies.

Proof of your qualifications – you will be asked to attend our office with original documents, we will take copies.

We will contact your referees, using the details you provide in your application, directly to obtain references.

If we make a final offer, we will also ask you for the following:

Bank details – to process salary payments

Emergency contact details – so we know who to contact in case you have an emergency at work.

18. Queries

18.1 If you have any queries about this Policy please contact either your Line manager or the DPO

19. Contacting Us

19.1 In the event of any query or complaint in connection with the information we hold, please email weymouthgolfclub@gmail.com or write to Weymouth Golf Club, Links Road, Weymouth, DT4 0PF.

Version dated 12/01/2022