



Balbriggan Golf Club

**General Data Protection Policy
Reviewed February, 2020**

Balbriggan Golf Club GDPR Policy Document

Regulation (EU) 2016/679 of the European Parliament and of the Council On the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulations)

Abbreviations and Definitions:

General Data Protection Regulations – GDPR

Data Controller – Balbriggan Golf Club via its nominated officer Hon. Secretary

Data Processor – a person or third party entity that processes information provided to the Data Controller for the purpose of providing products, benefits and services of Balbriggan Golf Club to the data subject

Data Subject – member of Balbriggan Golf Club, a visitor to Balbriggan Golf Club, other as may become relevant from time to time

BGC – Balbriggan Golf Club

This policy document refers to personal data, which is defined as information concerning any living person [a natural person who hereafter will be called the ‘Data Subject’] who is not already in the Public Domain.

The General Data Protection Regulations [GDPR], which came into law on 25th May, 2018, seeks to protect and enhance the rights of data subjects. These rights cover the safeguarding of personal data, protection against the unlawful processing of personal data and the unrestricted movement of personal data within the EU. It should be noted that GDPR does not apply to information already in the public domain.

This privacy policy sets out how we use and protect any information that you give to us when you become a member of Balbriggan Golf Club [BGC].

We are committed to ensuring that your privacy is protected, and we will never release your personal details to any third party without your express consent. When you complete an application to join the club certain personal information is collected from you as set out elsewhere in this policy document. This information may only be used in accordance with this privacy statement.

We require this information to administer your membership and to provide the products and services you have requested from us and provide you with a better service for the following reasons:

For membership applicants:

We will collect the following information:

Name and surname

Date of Birth

Current Address

Phone numbers (Landline, Mobile)

Email address

Gender

Handicap ability

Membership Category

The Hon. Secretary of the club shall act as Data Controller

What we do with the information we gather:

We require this information to administer your membership and to provide the products and services you have requested from us and provide you with a better service for the following reasons:

- Internal record keeping.
- Sending subscription notices to you.
- Recording financial transaction to your subscription account.
- Contacting you with relevant club correspondence.
- Maintaining a record of any competitions you play in.
- Maintaining a record of your handicap.
- Informing your Team Managers of your contact information and handicap for the purposes of team selection and management of external competitions.
- Providing you with a Member's Card for gaining access to the club, competition entry and discounted bar facilities.
- Confirm your handicap to other Golf Clubs if they request confirmation of your handicap for any competitions you have entered with them.

We will retain your personal information on our club membership database for the duration of your membership.

From time to time we may also contact you for club research purposes

Send promotional emails about special offers, competitions, results or other information which we think you may find of interest. We will use the email address which you have provided for this purpose.

The Inter-Club competitions if you are selected to represent the club this will require the sharing of information related to you with other clubs but only in so far as it is required to complete the necessary compliance with competition rules.

Provide your contact information to your Team Manager and team mates to communicate with you for the duration of your representation on a team.

Display your handicap details within the locker room from time to time where a handicap adjustment has taken effect.

Publish your name and handicap details on the web-site as part of the publication of competition results where such publication is applicable to you.

In the event that you leave the club we will retain sufficient information regarding your membership to comply with proper record keeping for a duration of no greater than three years following the final year of your membership on our secure servers and within our secured manual documentation. i.e. Handicap records, contact information to notify you of anniversaries or special events.

We take your privacy seriously and all such information is held on secure servers.

Data Controllers/Data Processors:

BGC is the Data Controller of members, visitors, and staff data, represented by the Hon. Secretary as the nominated person responsible. For the purpose of controlling data relevant to parties which has been obtained by BGC for the purpose of BGC's appropriate performance of its contractual obligations towards these groups of individuals. A Data Controller is the entity in this instance BGC who through a nominated individual controls and is responsible for the keeping and use of personal information on computers or in structured manual hard copy files pertaining to the aforementioned groups of individuals.

The nominated individual who is responsible as the Data Controller for BGC is the Hon. Secretary

Being the Data Controller carries with it serious legal responsibilities, therefore it is important that those obligations are understood and fully explained to all relevant parties

within BGC who may be required to act on behalf of the Hon. Secretary in the role of Data Controller as a part of their normal duties such persons or entities would be defined as Data Processors. People and entities required to perform on behalf of BGC include but are not limited to staff, volunteers, third party service providers. Systems and procedures for the purpose of Data Control will be routinely risk assessed for compliance and relevance.

Data Processor A Data Processor is distinct from a Data Controller. An organisation through its nominated appointee can be both a Processor and Controller. An organisation which is not BGC can be a Data Processor acting for and on behalf of BGC. E.g. A third party service provider such as ClubV1 and BRS these entities and others provide a service which processes data provided by BGC to them for the purpose of delivering their services for the benefit of the members, in this instance the processing of competitions and management of handicaps for example. Both these organisations are GDPR compliant and have their own privacy policies, procedures and security in place. BGC must satisfy itself that any such third party 'data processor' is equally compliant with GDPR when releasing personal data to that third party for the purpose of receiving a service from said third party.

CGI/GUI/ILGU:

The Club is affiliated to the Golfing Union of Ireland and the Irish Ladies Golf Union. The GUI and the ILGU operate and maintain the details of the handicap of members on the www.ClubV1.ie system and for this purpose allocates each individual member of the Club a unique personal identifier number [this is your unique 'Club Membership No'] The system has been designed by GUI/ILGU to provide members of the Clubs affiliated to GUI/ILGU with enhanced membership services free of charge. BGC also uses BRS Golf which is for the purpose of booking tee times and viewing competitions scheduled on the diary.

As a member of the GUI/ILGU you consent to the use of said organisations use of your data as described below. The purposes for which GUI/ILGU may use the data are as follows:

1. GUI/ILGU may use your details to communicate directly with the people who play the golf in Ireland, to provide information and other benefits relating to your membership
2. The GUI/ILGU issue your handicap. You agree that the Club and other GUI/ILGU affiliated Clubs in which you may play competitions may provide your name, address, membership no. gender, date of birth, your card number and your results history to the GUI/ILGU for the purpose of operating the data base system. The club agrees to keep your data on the system securely and only use it for the purposes set out in this policy document.

Electronic Payments:

BGC complies with the security requirements of the credit card Payment Card Industry Data Security Standard [PCI DSS] Program and compliance is validated annually. PCI requirements apply to all systems that store, process, or transmit cardholder data. Electronic storage of cardholder data is not conducted or permitted.

Personal Data:

BGC uses the information collected from its members to provide membership services, subscription billing, make telephone contact and to email you marketing information and course information which BGC believes may be of interest to you. Also where applicable as a courtesy we will notify you of significant events relevant to the memberships such as notifications of deceased members. By making initial contact with BGC you consent to BGC maintaining a marketing dialogue with you until you either opt out [which you can do at any stage] or we decide to desist in promoting our services. BGC also acts on behalf of its members in the capacity of data processor.

Some personal data may be collected about you from the forms and surveys you may complete, from records of our correspondence and phone calls and detail of your visits to our website, including but not limited to personally identifying information like Internet Protocol [IP] addresses. BGC may from time to time use such information to identify its visitors. BGC may also collect statistics about the behaviour of visitors to its website.

Website, Social Media:

From time to time information and photographs will be posted on the BGC website and other social media with the intention of informing members and visitors of the activities within the club in order to promote the goodwill of the club and enjoyable experiences to be had by participating in these activities.

Cookies:

BGC website does not use cookies at the time of printing.

CCTV:

BGC uses CCTV to capture images of individuals or information relating to individuals for Health and Safety reasons and crime prevention.

Data is processed fairly and lawfully and images of people and the information which is derived from images – for example vehicle registration numbers, are covered by the Data Protection Act. Recorded material is password protected and stored for a maximum of 30 days. Advisory signs are in use at the premises

Consent:

Through agreeing to BGC privacy notice you are consenting to BGC processing your personal data for the purposes outlined in this policy document. You can withdraw consent at any time by emailing balbriggangolfclub@eircom.net or writing to the club c/o Hon. Secretary.

BGC may pass on your Personal Information to third parties exclusively to process work on its behalf. Such information will be confined to only the data that third party needs to carry out the function for which it has been contracted. Said parties agree to process this information based on our instructions and requirements consistent with this Privacy Policy and related notices and with GDPR.

BGC does not broker or pass on information gained from your engagement with the club without your consent. However, BGC may disclose your personal information to meet legal

obligations, regulations or valid governmental request. BGC may investigate potential violations of its rules terms and conditions. Including detection, prevention or mitigation of a fraud or security or technical issue, or to protect against harm to the rights, property or safety of Balbriggan Golf Club, its members, guests and/or the wider community.

Data Storage:

Data is held in Ireland using different [multiple] servers. BGC does not store personal data outside the EEA.

Your Rights as a Data Subject:

At any point whilst BGC is in possession of or processing your personal data, all data subjects have the following rights:

1. Rights of access – you have the right to request a copy of the information that we hold about you.
2. Right of rectification – you have the right correct data that we hold about you that is inaccurate or incomplete.
3. Right to be deleted – in certain circumstances you can ask for the data we hold about you to be erased from our records.
4. Right to restriction of processing – where certain conditions apply you have a right to restrict the processing.
5. Right of portability – you have the right to have the data we hold about you transferred to another organisation.
6. Right to object – you have the right to object to certain types of processing such as direct marketing.
7. Right to object to automated processing, including profiling – you also have the right not to be subject to the legal effects of automated profiling.
8. In the event that BGC refuses your request under rights of access, we will provide you with a reason as to why, which you have the right to legally challenge.
9. BGC at your request can confirm what information it holds about you and how that information is processed.

You can request the following information:

1. Identity and the contact details of the person or organisation that has determined how and why to process your data.
2. The purpose of the processing as well as the legal basis for processing.
3. If the processing is based on the legitimate interests of BGC or a third party such as one of its clients, information about those interests.
4. The categories of personal data collected, stored and processed.
5. Recipient(s) or categories of recipients that this data is/will be disclosed to.
6. How long the data will be stored.
7. Information about your right to withdraw consent at any time.
8. How to lodge a complaint with the supervisory authority [Data Protection Regulator].
9. The source of personal data if it was not collected directly from you.

10. Any details and information of automated decision making, such as profiling, and any meaningful information about the logic involved, as well as the significance and expected consequences of such processing.

To access what personal data is held, identification will be required. BGC will accept the following forms of ID when information on your personal data is requested:

1. A copy of your national ID card,
2. Driving Licence
3. Valid Passport

A minimum of one piece of photographic ID is required and a supporting document. If BGC is dissatisfied with the quality, further information may be sought before personal data can be released. N.B. Being known to the recipient of the information is not sufficient and does not satisfy appropriate identification.

All requests should be made to balbriggangolfclub@eircom.net or by phoning initially 01 841229 or in writing to Blackhall Place, Balbriggan, County Dublin.

Complaints:

In the event that you wish to make a complaint about how your personal data is being processed by BGC or its partners, you have the right to complain to BGC Council. If you do not get a response within 30 days you can complain to the Data Protection Regulator.

Contact details as set out below:

Data Protection Regulator,
Office of the Data Protection Commissioner,
Canal House,
Station Road,
Portarlinton,
County Laois R32 AP23
Telephone: 1890 25 22 31
Email: info@dataprotection.ie

Internal Instructions:

All persons employed by or acting on a voluntary basis on behalf of BGC who may be required to act as part of their employment or voluntary work as a Data Processor, is bound by these regulations. They have been instructed in person and in writing as to their obligations and restrictions in the performance of these duties. If any person believes that any data processor is in breach of these regulations please advise the Data Controller Hon. Secretary as soon as possible.

This document was reviewed and approved by the Balbriggan Golf Club Council in February, 2020.