

MOND VALLEY GOLF CLUB



Data Protection Policy

This Policy Applies to:

- Mond Valley Golf Club.
- all sites under the control of Mond Valley Golf Club
- all staff and volunteers operating on behalf of Mond Valley Golf Club.

Policy Operational Date:

- With effect from November 2018
- Policy prepared by: Data Protection Officer – Huw Rees (Secretary)
- Date approved by Management: November 2018
- Policy review date: Annually

Introduction

This policy sets out how we use and protect any personal information that has been given to Mond Valley Golf Club by its members, visitors or members of staff. This information may have been obtained via completion of paper application forms or by electronic data collection from the club's website.

We are committed to ensuring that personal privacy is protected. Any information by which a person can be identified will only be used in accordance with this privacy statement.

Mond Valley Golf Club will manage personal data sensitively and will treat all personal information as confidential and are fully compliant with General Data Protection Regulations (GDPR) which came into force on 25th May 2018.

The purpose of this policy is to enable Mond Valley Golf Club to:

- Comply with the law in respect of the data it holds about individuals
- Follow good practice about data collection and storage
- Protect Mond Valley Golf Club members, staff and other individuals

- Protect Mond Valley Golf Club from the consequences of a breach of its responsibilities

The General Data Protection Principles require that Personal Information is:

- Processed fairly and lawfully
- Processed for limited purposes
- Adequate, relevant and not excessive
- Accurate and up to date
- Not kept for longer than is necessary
- Processed in line with the rights of individuals
- Data to be held using secure systems and control

Mond Valley Golf Club has identified the following potential key risks which this policy is designed to address

- Breach of confidentiality (information being given out inappropriately)
- Insufficient clarity about the range of uses to which data will be put
- Not obtaining consent to use personal data
- Breach of security by allowing unauthorised access
- Failure to establish efficient systems of managing changes leading to personal data not being up to date
- Harm to individuals if personal data is not up to date
- Insufficient clarity about the way staff or volunteers' personal data being used e.g. given out to public.

What we Collect

We may collect the following information:

- Name and surname
- Home postal address
- Email address
- Telephone number
- Gender
- Date of Birth
- Handicap ability or information
- Membership Category
- In some cases, medical information for emergency purposes.

What we do with the Information we Gather

We require this information to understand your needs and provide you with a better service and for the following reasons:

- Internal record keeping
- To improve our products and service
- Provision of membership card giving the ability of identity and the provision to load money on to the card and spend money at the club
- Control of members handicaps.
- We may periodically send news update emails, special offers, competitions, results, functions or any other information appropriate to Mond Valley Golf Club activities.
- We may use the information to customise the website according to your interests.

Contact Policy

We would like you to be the first to receive offers and news about the golf course. These messages will be send out in various ways by email, post. SMS, phone and social media but only if you would like to receive our communications.

Your privacy is very important to us which is why we make sure you're always in control of what we do with your personal information.

Customer Contact Promise

- We will never pass your personal details to any third party
- We will only use your details to help personalise communications
- We will make sure our contact with you is relevant based on the information you gave us.
- You have the right to opt out at any time.

All requests for alterations or opting out is done through email to our Data Protection Officer. Please contact the email address secretary@mondvalleygolf.co.uk We will ensure within 7 days that your request will be dealt with to stop contact from Mond Valley.

Security

We are committed to ensuring that all personal information collected is saved in a secure manner. To prevent unauthorised access or disclosure, suitable physical,

electronic and managerial procedures to safeguard and secure the information have been put in place

We do not transfer personal information to international third parties We maintain adequate technical and organisational security measures to protect personal information from loss, misuse, unauthorised access, disclosure, alteration, or destruction

Any data transferred or shared will be via encrypted files with secure passwords Data on any individual will be held in as few places as necessary, and all staff will be discouraged from establishing unnecessary additional data sets.

In the event of a security breach Mond Valley Golf Club will notify the ICO without undue delay and, where feasible, within 72 hours of awareness unless the breach is “unlikely to result in a risk to the rights and freedoms” of data subjects

Mond Valley Golf Club will regularly review its procedures for ensuring that its records of Data will remain accurate and consistent and, in particular:

Retention of Data

Mond Valley Golf Club will only keep personal information for as long as necessary for the purposes for which it was collected, to provide you with services and to conduct our legitimate business interests or where otherwise required by law

Members who leave the club will have all personal data relating to them removed after 1 year, the club will retain basic information such as name and handicap data (CDH number) for up to 6 years to facilitate the member wishing to re-join the club again later

- IT systems will be designed, where possible, to encourage and facilitate the entry of accurate data.
- Effective procedures will be in place so that all relevant systems are updated when information about any individual changes.
- Member’s data held on the website will require the permission of the member before it becomes accessible to other members. Permissions will be obtained by way of updating “profile data” and making it viable or private. These permissions may be withdrawn at any time by a member. Archived paper records of members data will be stored in secure filing cabinets.

CCTV

Mond Valley Golf Club has:

- Installed a CCTV system which produces clear images which the law enforcement bodies can use to investigate crime and these images can easily be taken from the system when required
- Monitors are sited in a position that provides the staff (nominated only) with easy access to view images
- Placed visible signs showing that CCTV is in operation
- A limited number of authorised persons that may access the recorded images from the CCTV system, which are securely stored. The recorded images are held for 28 days and except for law enforcement bodies, images or viewing will not be provided to third parties without Data Protection Officer permission
- Requests for viewing CCTV by a member is via Data Protection Officer only. Please email secretary@mondvalleygolf.co.uk

Photography

On occasions photographs are taken at golf club functions such as Prize Presentations, Dinners and Charity events, at all these an announcement will be made informing those present that photographs may be taken and if anyone wishes not to be photographed they will be given the opportunity to decline, this will be made especially clear when photographs include children.

Photographs will be used for club newsletters, website and on the club's social media sites. The image of any person will not be shown in any way to the detriment of the person. Should anyone subsequently wish to have the photographs removed or taken down this will be acted on in a timely manner following the request.

Policy and Data Review: This policy will be reviewed every 2 years unless circumstances warrant an earlier review such as a change in legal requirements

Changes to the Policy

We reserve the right to modify, add or remove sections of this privacy policy at any time due to changes in the law or to suit changes in the working practices of Mond Valley Golf Club. If these changes have material impact on anyone whose data is held they will be notified using the contact details held.

Privacy Questions

Any questions regarding this policy will be acted on in a timely manner following the request. This will typically be within one week.

- What are an individual's rights in relation to GDPR?

- The right to be informed – about what data you hold and how it is used
- The right of access – to request a copy of all information held about themselves
- The right to have errors or mistakes corrected
- The right to have information deleted
- The right to restrict processing – to opt out of marketing etc

Access and Correction Rights

Individuals can request access to, and have the opportunity to update and amend any personal information held by Mond Valley Golf Club, and can exercise any other rights under applicable data protection laws, including, for example, objection to and blocking of the processing of your personal information, The right for individuals to access their personal data through a “Subject Access Request” by contacting us.

For security reasons, we reserve the right to take steps to authenticate the identity of the individual before providing access to their personal information. Personal data will be provided without charge and within a time frame of one month. Further information can be obtained from the Information Commissioners Office at the ICO web site