

Ham Manor Golf Club

PRIVACY NOTICE FOR OUR MEMBERS

1 INTRODUCTION

This notice is to explain how we may use personal information we collect during and after your membership with us. This notice applies to you if you are a member of our club, or have registered to become a member. This notice explains how we comply with the law on data protection and what your rights are. For the purposes of data protection, we will be the controller of any of your personal information.

References to **we**, **our** or **us** in this privacy notice mean Ham Manor Golf Club Limited.

The General Manager will be the designated Data Controller and will oversee our compliance with data protection laws, and has overall responsibility for data protection compliance in our Club. Contact details are set out in the **Contacting Us** section at the end of this privacy notice.

2 PERSONAL INFORMATION

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, such as:

- personal contact details that allows us to contact you directly such as name, title, address, email address and telephone numbers;
- date of birth;
- gender;
- membership start and end date;
- references and other information included in a CV or cover letter, or as part of the application process for membership;
- records of your interactions with us such as telephone conversations, emails and other correspondence and your instructions to us;
- any credit/debit card and other payment details you provide so that we can receive payments from you and details of the financial transactions with you;
- membership identification number, IP address, user names and other IT system identifying information;
- records of your attendance at any events hosted by us;

- CCTV footage and other information obtained through electronic means such as swipe-card and key fob records;
- images in video and/or photographic form and voice recordings;
- your marketing preferences so that we know whether and how we should contact you;
- details of any county membership;
- details of next of kin, family members and emergency contacts;
- records and assessment of any player rankings, grading or ratings, competition results, details regarding events/matches/games attended and performance;
- any disciplinary and grievance information;
- any details of accidents

2.1 SPECIAL CATEGORIES OF PERSONAL INFORMATION

We may also collect, store and use the following “special categories” of more sensitive personal information about you:

- information about your health, including any medical condition.

Unless specifically requested, we ask that you **do not send us** and you do not disclose any other Sensitive Personal Data (*e.g.* National Insurance number, data related to racial or ethnic origin, political opinions, religion, ideological or other beliefs, biometrics or genetic characteristics, criminal background, trade union membership, or administrative or criminal proceedings and sanctions).

3 WHERE WE COLLECT YOUR INFORMATION

We typically collect personal information about our members when you apply to become a member of the club, when you purchase any services or products we offer, when you make a query and/or complaint or when you correspond with us by telephone, e-mail or in some other way.

We also may collect personal information about you from any third party references you provide as part of the application process for membership.

If you are providing us with details of referees, next of kin, beneficiaries, family members and emergency contacts they have a right to know what personal information we hold about them, how we collect it, how we use it and how we may share that information. Please share this privacy notice with those whom you feel should be aware as they have the same rights as set out in the **Your rights** section below.

4 USES MADE OF THE INFORMATION

4.1 MAIN PURPOSES

The table below describes the main purposes for which we process your personal information, the categories of your information involved and our lawful basis for being able to do this.

There is a legal, contractual or other requirement for you to provide us with your personal data. If you do not provide us with the requested personal information we may not be able to admit you as a member or we may not be able to properly perform our contract with you, or comply with legal obligations and we may have to terminate your membership. For other

personal data, you may not be under an obligation to provide it to us, but if you do not provide it then we may not be able to properly perform our contract with you.

Where you have given us your consent to use your personal information in a particular manner, you have the right to withdraw this consent at any time, which you may do by contacting us as described in the **Contacting us** section below.

However, please note that the withdrawal of your consent will not affect any use of the data made before you withdrew your consent and we may still be entitled to hold and process the relevant personal information to the extent that we are entitled to do so on bases other than your consent. Withdrawing consent may also have the same effect as not providing the information in the first place, for example we may no longer be able to provide certain member benefits to you.

Purpose	Personal information used	Lawful basis
To administer any membership you have with us and manage our relationship with you, including dealing with payments, support, service or product, and any enquiries made by you	All contact and membership details, transaction and payment information, records of your interactions with us, and marketing preferences.	This is necessary to enable us to properly manage and administer your membership contract with us.
To arrange and manage any contracts for the provision of any services or products	Contact details, transaction and payment information. Records of your interactions with us.	This is necessary to enable us to properly administer and perform any contract for the provision of any services and products you have purchased from us.
To send you information which is included within your membership benefits package, including details about advanced ticket information, competitions and events, partner offers and discounts and any updates on the services offered by the Club	Contact and membership details.	This is necessary to enable us to properly manage and administer your membership contract with us.
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, events, products and information about our commercial partners	Contact details and marketing preferences.	Where you have given us your explicit consent to do so.
To answer your queries or complaints	Contact details and records of your interactions with us	We have a legitimate interest to provide complaint handling

		services to you in case there are any issues with your membership.
Retention of records	All the personal information we collect.	<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 run our club and in some cases we may have legal or regulatory obligations to retain records.</p> <p>We process special category personal data on the basis of the “special category reasons for processing of your personal data” referred to in section 2 above.</p>
The security of our IT systems	Your usage of our IT systems and online portals.	We have a legitimate interest to ensure that our IT systems are secure.
To conduct data analytics studies to better understand event attendance and trends within the sport	Records of your attendance at any events or competitions hosted by us.	We have a legitimate interest in doing so to ensure that our membership is targeted and relevant.
For the purposes of promoting the club, our events and membership packages.	Images in video and/or photographic form.	Where you have given us your explicit consent to do so.
To comply with health and safety requirements	Records of attendance, CCTV footage and other information obtained through electronic means such as swipe-card, key fob records and medical information about your health.	<p>We have a legal obligation and a legitimate interest to provide you and other members of our organisation with a safe environment in which to participate in sport.</p> <p>We process special category personal data on the basis of the “special category reasons for processing of your personal data” referred to in section 2 above.</p>
To administer your attendance at any courses or programmes you sign up to	All contact and membership details, transaction and payment data.	This is necessary to enable us to register you on to and properly manage and administer your attendance on the course and/or programme.

	Details of any county membership and performance data.	
To arrange for any trip or transportation to and from an event	Identification documents details of next of kin, family members and emergency contacts, transaction and payment information, health and medical information.	This is necessary to enable us to make the necessary arrangements for the trip and/or transportation to an event. We process special category personal data on the basis of the “special category reasons for processing of your personal data” referred to in section 2 above.
To use information about your physical or disability status to ensure your health and safety and to assess your fitness to participate in any events or activities we host, and to provide appropriate adjustments to our Club facilities.	Health and medical information	We process special category personal data on the basis of the “special category reasons for processing of your personal data” referred to in section 2 above.
To gather evidence for possible grievance or disciplinary hearings	All the personal information we collect	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. We process special category personal data on the basis of the “special category reasons for processing of your personal data” referred to in section 2 above.
To comply with legal obligations, for example, regarding people working with children or vulnerable adults to comply with our safeguarding requirements	Information about your criminal convictions and offences	For criminal records history we process it on the basis of legal obligations or based on your explicit consent.

4.2 DIRECT MARKETING

Email, post and SMS marketing: from time to time, we may contact you by email, post or SMS with information about products and services we believe you may be interested in.

We will only send marketing messages to you in accordance with the marketing preferences you set. You can then let us know at any time that you do not wish to receive marketing messages by setting your preferences via the Members’ website [My Golf/Preferences: (<https://hammanor.intelligentgolf.co.uk/prefs.php>)].

You can also unsubscribe from our marketing by clicking on the unsubscribe link in the marketing messages we send to you.

Alternatively, you can contact us by using the details set out in the "**Contacting us**" section below.

5 DISCLOSURE OF PERSONAL INFORMATION

We make certain personal data available to third parties who provide services to us. We do so on a "need to know basis" and in accordance with applicable data protection and data privacy laws. Whenever we permit a third party to access personal information we will implement appropriate measures to ensure the data is used in a manner consistent with this notice and that the security and confidentiality of the data is maintained.

We may also disclose personal data to third parties on other lawful grounds, including:

- To comply with our legal obligations, including where necessary to abide by law, regulation or contract, or to respond to a court order, administrative or judicial process
- In response to lawful requests by public authorities (including for national security or law enforcement purposes)
- As necessary to establish, exercise or defend against potential, threatened or actual litigation
- Where necessary to protect the vital interests of our employees or another person
- With your freely given and explicit consent

6 SECURITY

6.1 ACCESS

We will use reasonable organizational, technical and administrative measures to protect personal data. We will ensure that personal data is secure against loss or misuse. Where other organisations process personal data as a service on our behalf, we will establish any additional specific data security arrangements needed to comply with this policy. Our procedures governing the authorised access and use of personal data apply to all who have a legitimate need to use personal data, such as Staff, Directors, Sub-contractors and Members with a specific role in the operation of the Club (e.g. Captains, Junior Organiser). This applies to all forms of personal data, either stored on the computer system or in hard copy.

If you have reason to believe that your interaction with us is no longer secure (for example, if you feel that the security of your account has been compromised), please notify us immediately in accordance with the **Contacting Us** section.

6.2 TRANSFERRING YOUR PERSONAL INFORMATION INTERNATIONALLY

The personal information we collect is not transferred to and stored in countries outside of the UK and the European Union.

6.3 HOW LONG DO WE KEEP PERSONAL INFORMATION FOR?

The duration for which we retain your personal information will differ depending on the type of information and the reason why we collected it from you. However, in some cases

personal information may be retained on a long-term basis: for example, personal information that we need to retain for legal purposes will normally be retained in accordance with usual commercial practice and regulatory requirements. Generally, where there is no legal requirement we retain all physical and electronic records for a period of 6 years after your last contact with us or the end of your membership. Exceptions to this rule are:

- CCTV records which are held for no more than 30 days unless we need to preserve the records for the purpose of prevention and detection of crime;
- Details regarding unsuccessful membership applicants where we hold records for a period of not more than 12 months;
- Information that may be relevant to personal injury or discrimination claims may be retained until the limitation period for those types of claims has expired. For personal injury or discrimination claims this can be an extended period as the limitation period might not start to run until a long time after the event.

6.4 ACCURACY

It is important to ensure that the personal information we hold about you is accurate and up-to-date, and you should let us know if anything changes. You are able to update some of the personal information we hold about you through the members' website [My Golf/Preferences: (<https://hammanor.intelligentgolf.co.uk/prefs.php>)].

Alternatively, you can contact us by using the details set out in the "**Contacting us**" section below.

7 YOUR RIGHTS

You have the following rights in relation to your personal information:

- the right to be informed about how your personal information is being used;
- the right to access the personal information we hold about you;
- the right to request the correction of inaccurate personal information we hold about you;
- the right to request the erasure of your personal information in certain limited circumstances;
- the right to restrict processing of your personal information where certain requirements are met;
- the right to object to the processing of your personal information;
- the right to request that we transfer elements of your data either to you or another service provider; and
- the right to object to certain automated decision-making processes using your personal information.

You should note that some of these rights, for example the right to require us to transfer your data to another service provider or the right to object to automated decision making, may not apply as they have specific requirements and exemptions which apply to them and they may not apply to personal information recorded and stored by us. For example, we do not use automated decision making in relation to your personal data. However, some have no conditions attached, so your right to withdraw consent or object to processing for direct marketing are absolute rights.

Whilst this privacy notice sets out a general summary of your legal rights in respect of personal information, this is a very complex area of law. More information about your legal rights can be found on the Information Commissioner's website at <https://ico.org.uk/for-the-public/>. To exercise any of the above rights, or if you have any questions relating to your rights, please contact us by using the details set out in the **Contacting us** section below.

8 CHANGES TO THIS NOTICE

We may update this privacy notice from time to time. When we change this notice in a material way, we will update the version number and issue date. For significant changes to this notice we will try to give you reasonable notice unless we are prevented from doing so. Where required by law, we will seek your consent to changes in the way we use your personal information.

9 CONTACTING US

In the event of any query or complaint in connection with the information we hold about you please email secretary@hammanor.co.uk or write to:

General Manager
Ham Manor Golf Club
West Drive
Angmering
West Sussex
BN16 4JE