

# Portarlinton Golf Club Data Protection Policy

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## Introduction

Your privacy is important to us, and we understand how important it is to you. Our aim is to be as clear and open as possible about what we do and why we do it. Portarlinton Golf Club (PGC) is committed to the privacy of our members.

The purpose of this document is to:

- Provide information on The General Data Protection Regulation (GDPR)
- Identify what information PGC may hold and how such information is used and protected by PGC

This Privacy Policy covers our treatment of your personal information that we gather when you are interacting with PGC as a member, visitor, vendor, supplier, website user, or otherwise (a “Data Subject”). In the course of our business, we gather various types of information about our Data Subjects including information that identifies you as an individual (“Personal Data”) as explained in more detail below.

## GDPR and Key Terms

GDPR came into law on 25th May 2018 and regulates how personal data is processed in accordance with an EU citizen’s Fundamental Rights. GDPR sets down the rules that apply for it to be lawful to use personal data and spells out the rights of those whose data is being processed (Data subjects). GDPR sets out the obligations and responsibilities for organisations and businesses in how they collect, use and protect personal data. Organisations and businesses are required to be fully transparent about how they are using and safeguarding personal data, and to be able to demonstrate accountability for their data processing activities. Under the GDPR, personal data is data that relates to or can identify an individual either by itself or together with other available information. Examples of personal data include a person’s name, phone number, bank details and medical history. In summary, GDPR obliges organisations to ensure the security of data, to process any data collected in a secure manner, to report breaches, to collect and retain only the data necessary in order to fulfil the purposes for which it has been obtained and to communicate clearly such purposes to Data Subjects.

More information may be found on the GDPR citizens’ information page at: [https://www.citizensinformation.ie/en/government\\_in\\_ireland/data\\_protection/overview\\_of\\_general\\_data\\_protection\\_regulation.html](https://www.citizensinformation.ie/en/government_in_ireland/data_protection/overview_of_general_data_protection_regulation.html)

## Data Controller

PGC is the data Controller of Members, Visitors and Staff data, required for the performance of its contractual obligations to these groups of individuals. The data controller determines the purposes for which and the means by which personal data is processed.

## Data Processor

A data processor is distinct from the data controller for whom they are processing the personal data. An employee of a data controller, or a section or unit within an organisation which is processing

personal data is not a "data processor". However, someone who is not employed by the data controller, but is contracted to provide a particular data processing service (e.g. BRS, Smart Golf, and Handicap Master in the case of PGC)

### **Data Protection Officer**

In order to ensure that PGC processes any information held in compliance with the applicable data protection rules, a Data Protection Officer (DPO) has been appointed. PGC will be happy to assist with any queries in respect of your rights under GDPR and can be contacted at [clubsecretary@portarlingtongolfclub.ie](mailto:clubsecretary@portarlingtongolfclub.ie) or by a letter marked for their attention. Any queries you have in respect to your rights under GDPR should be addressed to the Data Protection Officer.

## Our Commitment

PGC are committed to ensuring that your privacy is protected and that any data received is processed and secured in compliance with GDPR. PGC will never knowingly allow your personal details to be used by any 3rd parties without your expressed consent either verbal or written.

The Club has appointed John Ryan (Hon. Secretary) as its Data Protection Officer.

Only persons with a legitimate and lawful reason will have access to personal data and it will not be shared with anyone without specific consent of the data subject. PGC undertake to deal with any access requests as quickly as possible and to seek permission if there is a need to process data collected outside the parameters set out in this policy document.

In keeping with best practice, PGC reserve the right to make alterations from time to time to our privacy policy without prior notice. We keep our statement under regular review and we will place this on our web page. It is important to view our privacy policy on our web site at <http://www.portarlingtongolfclub.ie> (last updated 11th March 2020).

It may be useful to outline the objectives of Portarlington Golf Club as defined in its Constitution:

- *“2.2.1 To establish, maintain and operate a golf club for the members of the Club (including their guests and visitors) at the Club’s premises located at Garryhinch, Portarlington, Co. Laois”,*
- *“2.2.2 To promote the game of golf and all things incidental to the playing of golf and”*
- *“2.2.3 To provide usual golf facilities to members of the Men’s’ Club and the Ladies’ Club.”*

This purpose sets the contours of the legitimate interests pursued by the Club and what is necessary in relation to processing personal data. In accepting membership, a member agrees to be bound by the Constitution and Rules of the Club. If the Club were to engage in activity outside the scope of its purpose and it entailed processing member’s data it would need explicit consent for that processing.

We collect the personal data that you may volunteer while using our services. We do not collect information about our visitors from other sources, such as public records or bodies, or private organisations. We do not collect or use personal data for any purpose other than the specific services. We do not collect any Special Categories of Personal Data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

## Individual Rights

You should be aware that it is necessary for the club to hold certain data in order to facilitate your membership of Portarlington Golf Club. It is within an individual’s rights to:

- Access the information held and the purposes and modalities of its use,
- Have your data rectified if inaccurate,
- Have it erased in certain circumstances,
- Restrict the use of your data in certain circumstances set down,
- Transfer your data to others,

- Object to processing of your data for particular reasons,
- Cessation of use of your data for direct marketing.

It is the Club's policy to respect member's rights in regard to use (processing) of their personal data in its possession, directly or by engagement with 3rd Parties.

To comply with GDPR, Club employees (including staff in the shop) cannot provide member contact details to other members who request it. If such contact details are required, a request should be made to the Club Office to contact that member on your behalf, forwarding your email or otherwise relaying your message to them (for instance the desire to fix a match), providing your contact details and requesting that they contact you. In addition, emails from the Club to all (or multiple) members will not display the emails of all contacted (in effect, 'blind copying' all to keep contact details private).

We take care to maintain the security of what GDPR terms as "Special Categories of Personal Data" (Article 9, GDPR). This includes data relating to under-18s, medical records (needed for buggy exemptions), this information is only available to the Club Admin and Honorary Secretary.

As a member you have rights to gain access to your personal records and to request the club to amend any personal data that is incorrect or out of date. You may also request a copy of your personal records by writing to the Clubs Data protection Officer.

Under GDPR the Club has up to one month to process a request but in all cases, we will endeavour to deal with your request as soon as possible. In order to view or obtain a copy of your personal data you must present yourself at the office and provide proof of identification. You also have the right to limit or restrict the use of your personal data by notifying the Clubs Data Protection Officer.

### **Non-Member Data**

Limited personal data may be held relating to non-members. This relates to: Tee time bookings made by visitors recorded on BRS, either by online booking or by direct contact with the Pro Shop (contact details may sometimes be provided and stored for such bookings). This information is held on BRS for a period of your last interaction with us for accounting and record-keeping purposes. In line with GDPR Regulation 13(11) of the Privacy Regulations, we may use this personal data for email marketing, but only for the marketing of similar services to those originally purchased (e.g. green fee deals for previous green fee purchasers). All such emails will offer the option to unsubscribe

### **Young Member Rights**

GDPR equally applies to Youth members and children and their data protection rights are equal to those of adult members as set out above. As identified, data relating under-18s is only available to the Club Admin and Honorary Secretary.

## Data Storage

Set out below is the information PGC holds on you, why we hold it and who it is shared with. The club separates data collected into 2 categories (either of which may contain personal data):

Structured Data	Data whose elements are addressable for effective analysis, such as database tables, as used by our technical systems
Unstructured Data	Data that is which is not organized in a pre-defined manner, such as emails, mail, PDF, written records

## Structured Data

There are currently 4 software applications used by PGC which have been identified as holding Personal Data in a structured format (on a database). These are as follows

### Smart Golf

The personal data held on this system includes:-

**Names, Addresses, Date of Birth, Mobile or Landline number, email address, date of joining and Bar/Restaurant account details**

This data is used to communicate with you in respect of your membership including renewal and to communicate with you in relation events happening within the club. Your phone numbers and email address may be shared with other members for the purpose of arranging matches and other golf related matters. In addition your date of birth is recorded to ensure that any age related benefits are applied to you in good time. It may also be shared with team managers and GUI and ILGU for the purpose of selecting and entering teams for competitions which have minimum or maximum age entry rules. This system also facilitates the topping up of membership cards for use in the Bar and Restaurant.

### BRS

The personal data held on this system includes:-

**Name, Address, Email address, Mobile or Landline number, IGLU/GUI number, Competition playing history**

This system is administered by a 3<sup>rd</sup> party (BRS Golf), based in Belfast and is used for managing the game of golf on your behalf and for the effective operation of the timesheet booking system. It maintains competition records and details of participation. It is also used to communicate club information e.g. Course closure and future club events, distribution of Newsletters, results and general notices for member's attention etc. User access is limited to those members of the Men's and Ladies club that require access and is password protected with the password being held and solely by those individuals. This information is required to administer your membership and to provide the products and services requested from us and to provide you with a better service.

From time to time, contact information may be used for club research purposes. It is also used to confirm handicaps to other Golf Clubs if they request confirmation of handicaps for any

competitions entered with them and to provide contact details to other club members such as team managers for the sole use of club business

All members have received written confirmation seeking consent to correspond by BRS, post, telephone, e-mail and SMS messaging for all activities including competitions, and social events. This information will not be shared with external marketing organisations and is retained for club purposes only

BRS Golf are an affiliate of NBC Universal and with their associated privacy policy located at <https://www.nbcuniversal.com/privacy>

### **HandicapMaster**

The personal data held on this system includes:-

**Name, address, phone number , email address**

The of Handicap Master Ltd, a company established in Cheshire, United Kingdom are used to administer the Men's and Ladies golf handicap system. Their proprietary system, Handicap Master incorporates CONGU rules on handicapping. Handicap Master have identified that they are in compliance with GDPR and their own privacy policy is located at <https://www.handicapmaster.org/about/privacypolicy.php>

### **ClubV1**

Your competition playing history is shared with the GUI & ILGU and with affiliated clubs for the purpose of facilitating your participation in competitions in other clubs and to externally verify your playing handicap. Under the Data Protection Acts, you are entitled to write to the GUI or ILGU at their address or email [info@GUI.ie](mailto:info@GUI.ie) / [info@ilgu.ie](mailto:info@ilgu.ie) to request a copy of your personal data which GUI/ ILGU holds.

The personal data held on this system includes:-

*name, address, phone number, email address, membership no., gender, date of birth, your card number and your results history to the GUI/ILGU for the purposes of operating the database system*

<https://www.clubsystems.com/privacy>

### **Unstructured Data**

Unstructured Data includes any information received or created in unstructured format. This includes information both stored electronically or within paper files and documents (hard copy format). All such data is stored and secured locally within the premises of PGC.

### **Electronic Data**

These consist primarily of emails and attachments sent and received by PGC, but may also include any documents created and stored on PGC computers.

### ***CCTV***

PGC has a number of CCTV cameras in the clubhouse, the environs of clubhouse and car park. These are used for security purposes and for the safety of members and visitors. Images on the cameras are retained for a period of one month; they are viewed by authorised staff and shared only with The Garda Siochana in the event of a report of a security breach or possible criminal activity.

### ***Photographs***

PGC actively promotes the recording of activity in the club and from time to time photographs are taken of players on the course and at prize presentations and social events. These photographs may be posted on the Club website and Social Media pages. This is done purely for promoting activities within the club and persons can opt out if they so wish and do not want photo imagery of themselves recorded. It's the member's responsibility to inform the club of opting out

### ***Card Machines***

We have card machines located in the shop, restaurant and office, where you can make payments by either credit card or debit card and we advise that when you choose the method of payment that you are physically present. If you choose to make a payment over the telephone, we do not record or store card details. They are immediately destroyed when the payment goes through. While the data provided for a transaction of booking a line using a credit card is data processing for the purpose of completing a contract and thus exempt for the purpose of establishing the legality of processing under Art 6.1(b) of GDPR, a visitor's data protection rights otherwise are the same as those referred to under the heading of "Individual Rights", identified earlier within this document.

### ***Website Visitor Tracking***

This Clubs website uses tracking software, Google Analytics, to monitor its visitors to better understand how they use it. The software will save a cookie to your computer's hard drive in order to track and monitor your engagement and usage of the website, but will not store, save or collect personal information. As required by legislation, where applicable this website uses a cookie control system, allowing the user to give explicit permission or to deny the use of /saving of cookies on their computer / device.

Users are advised that if they wish to deny the use and saving of cookies from this website on to their computers hard drive they should take necessary steps within their web browsers security settings to block all cookies from this website and its external serving vendors or use the cookie control system if available upon their first visit.

### ***Surveys and Forms***

Some personal data may be collected about you from the forms and surveys you complete, from records of our correspondence and phone calls and details of your visits to our website, including but not limited to personally identifying information like Internet Protocol (IP) addresses.

### ***Hardcopy Documents***

These consist primarily of files and documents which may include such items as Minutes, Medical Certificates, Employee Contracts, application forms, accident report forms; written correspondence (including email) received or created by PGC. Your handicap details and membership number are periodically displayed in the Locker Room area of the Clubhouse, in addition to competition results.

All such data is stored and secured within locked cabinets within the offices of PGC.



## **Retention Policy**

PGC will keep your personal information only for as long as necessary for the purposes for which it was collected, i.e. to provide you with services and to conduct our legitimate business interests or where otherwise required by law. This retention schedule will be governed by our internal governance procedures. (see appendix 1)

## **Complaints**

If you wish to raise a complaint on how we have handled your personal data you can contact the Golf Club Honorary Secretary who will investigate the matter. If you are not satisfied with our response or you believe we are not processing your personal data in accordance with the law you can complain to the Data Protection Commision: <https://www.dataprotection.ie/en/contact/how-contact-us>

## Appendix No 1: Mandatory Periods for Retention

Mandatory periods for retention		
Category of file	Statutory regulatory reference	Retention period
All files	Statute of Limitations Act 1957, as amended, and other relevant legislation	7 years minimum (six years liability period plus one year for service of proceedings)
All files	S. 8 and S. 9 Solicitors (Amendment) Act, 1994	5 years
All files	S 91 of the Finance Act 2014	For a period of 6 years <b>or</b> where a transaction, act or operation is the subject of an investigation, inquiry, claim, assessment, appeal or proceedings which has already commence within the 6-year period, then the relevant books or records must be retained until such time as the investigation, inquiry, claim, assessment, appeal or proceedings has concluded.
All files	Data Protection Acts 1988 to 2018	Personal data shall not be kept for longer than is required by the relevant statutory provision.
All files & Account records – the file forms part of accounts records	S25 (2) of S.I. No. 516 2014- Solicitors Account Regulations 2014	6 years

## Appendix No 2: Definitions as per GDPR legislation

For the avoidance of doubt, and for consistency in terminology, the following definitions will apply

<b>Data</b>	<p>This includes both automated and manual data.</p> <p>Automated data means data held on computer, or stored with the intention that it is processed on computer.</p> <p>Manual data means data that is processed as part of a relevant filing system, or which is stored with the intention that it forms part of a relevant filing system.</p>
<b>Personal Data</b>	<p>Information which relates to a living individual, who can be identified either directly from that data, or indirectly in conjunction with other data which is likely to come into the legitimate possession of the Data Controller.</p>
<b>Sensitive Personal Data</b>	<p>A particular category of Personal data, relating to: Racial or Ethnic Origin, Political Opinions, Religious, Ideological or Philosophical beliefs, Trade Union membership, Information relating to mental or physical health, information in relation to one's Sexual Orientation, information in relation to commission of a crime and information relating to conviction for a criminal offence.</p>
<b>Data Controller</b>	<p>A person or entity who, either alone or with others, controls the content and use of Personal Data by determining the purposes and means by which that Personal Data is processed.</p>
<b>Data Subject</b>	<p>A living individual who is the subject of the Personal Data, i.e. to whom the data relates either directly or indirectly.</p>
<b>Data Processor</b>	<p>A person or entity who processes Personal Data on behalf of a Data Controller on the basis of a formal, written contract, but who is not an employee of the Data Controller, processing such Data in the course of his/her employment.</p>
<b>Data Protection Officer</b>	<p>A person appointed by the Club to monitor compliance with the appropriate Data Protection legislation, to deal with Subject Access Requests, and to respond to Data Protection queries from staff members and service recipients</p>
<b>Relevant Filing System</b>	<p>Any set of information in relation to living individuals which is not processed by means of equipment operating automatically (computers), and that is structured, either by reference to individuals, or by reference to criteria relating to individuals, in such a manner that specific information relating to an individual is readily retrievable.</p>