

BALTINGLASS GOLF CLUB

Data Protection Policy 2021

The **Data Protection Acts (DPA) 1988-2018** are designed to protect people's privacy. The legislation confers rights on individuals in relation to the privacy of their personal data as well as responsibilities on those persons holding and processing such data. The **General Data Protection Regulation (GDPR)** makes sure the information is used fairly, lawfully and transparently. **(See Appendix 1)**. Personal data are any information which are related to an identified or identifiable natural person. For example, the telephone, credit card or personnel number of a person, account data, number plate, appearance, member's numbers or address are all personal data.

Baltinglass Golf Club is a members' club and provides a golf course, clubhouse and work sheds suited to the best interests of its members, all other course users, staff and leasing personnel. The Club, as an active organisation, must from time-to-time seek and collect information. This information may include details of 1) Members past and present; 2) Club visitors; 3) Current, past and prospective employees; 4) Leasing personnel; 5) Club sales persons, suppliers and contractors; 6) Golf PGA professional. Baltinglass Golf Club is committed to the correct management of personal data. The Club fully appreciates the underlying principles of the Data Protection Acts 1988-2018 and supports and adheres to their requirements. The Acts uses the term "**Personal Data**" which fundamentally means any recorded information held by the Club and from which a living person (**data subject**) can be identified.

Baltinglass Golf Club is committed to complying with the Data Protection Act Principles which are:

- Personal data obtained shall be processed accurately and fairly.
- Personal data will only be obtained for specified lawful purposes and shall not be further processed in any manner, incompatible with the Club's associated purposes.
- Personal Data will be relevant to the Club.
- Parental consent must be given in writing re Juvenile members' personal Data. **(See Appendix 2.)**
- Data is accurate, relevant and where necessary, kept-up-to-date. (Member obligation also).
- Data is kept only as long as is necessary.
- Data shall be processed in accordance with the individual's rights.
- Data will be secure against unauthorised access/alteration/disclosure/destruction.
- Data will not be transmitted to any other third party without adequate protection.

The Club confirms that it will not process data unless one or other of the following conditions apply:

- ✓ Consent has been given by the person to process his/her data.
- ✓ It is required under a legal obligation
- ✓ Employees' contracts of employment. To protect the interest of the individual.
- ✓ It is for the purpose of carrying out Club functions, including complying with legal obligations.
- ✓ It is necessary to pursue Club interests and those of third parties.

Sensitive personal data will not be processed unless one of the following pre-conditions are met:

- ❖ The member has consented.
- ❖ The information is required to be processed by operation of law or for employment purposes.
- ❖ It is for the protection of the individual or another person.
- ❖ **Data subject Rights;** Individuals have the right of access to data held about them and an individual who asks to see their information, called a '**subject access request**', will have access to their data within 40 days.
- ❖ Members have, at all times, the right to 'opt out' from receiving Club messaging.
- ❖ Ex-members have at all times, the right to demand that their personal data be deleted by the Club.

The Club will act as a Data Controller in respect of Personal Data provided by all who interact with the Club's procedures and administrations. We will only process data necessary:

- To establish, maintain membership or support.
- To provide or administer activities for those who are members of the Club.
- Unless previously affiliated to Golf Ireland, the Club submits a member's details to Golf Ireland who issue to the member a Golf Ireland card with a personal identifier number. A member's name and handicap may from time-to-time be displayed in the Clubhouse locker room.
- Team managers & team members who volunteer/selected to represent the Club in interclub competitions must allow their name, Golf Ireland identifier number and their handicap details to be transferred to the opposing team.
- Participants in Club matches are expected to exchange contact details in organising their matches.
- When partners, who are both members of the Club, seek a related annual subscription reduction, the information, that meets this requirement, and qualifies both for the relevant reduction, is recorded by the Club.
- Persons who make regular contact with the Club to organise activities.
- Only keep the information whilst the individual is a member or of ex-members who may re-join. **(See Appendix 3).**

Data Security:

The Club is committed to the safe control of the Personal Data given to the Club for administration purposes and it limits the amount of Personal Data required. Access to the data collected is restricted only to those with administration duties and is stringently controlled. Special Categories of Data can pertain to the administration of Club employees. The Club uses Club Systems/ClubV1 and BRS. Club Systems manages members' handicaps. The ClubV1 system is used to maintain a profile of each member, documenting the information as requested in the Club's 'Membership Application Form.' It also records members' handicaps and Golf Ireland personal identifier number. The Club uses BRS to process Club competitions and social golf tee-time reservations. It can also include green fee and society booking reservations. These systems are GDPR compliant, each one has its own privacy procedures and security.

- On becoming a member of Baltinglass Golf Club, the Club seeks the following personal information from its members. Name, Address, DOB, Mobile/Telephone No., E-mail address and membership category. An applicant's name, as well as the proposer and seconder, are identified and posted on the Club's notice board. Juvenile Membership Application form requires the following details re their parents/guardians: Name, Address, Mobile/Telephone No., and E-mail address. The Juvenile's Name, Address, DOB, is sought while the Mobile No. is also requested for those 16 years of age and over.
- Other general information sought: Name of previous Golf Club (if relevant), Name of previous pitch & putt club (if relevant) and the lowest handicap achieved.
- Information given by a potential member completing a 'Membership Application Form' consents to the information *'being stored as a hard/digital copy by Baltinglass Golf Club'*.
- Access to the hard/digital copy is restricted on a need-to-know basis to the Club Secretary, Treasurer, Office supervisor, Competition Secretaries and Team Managers. A password is required to access a digital copy of stored information. Hard copy files are securely stored in the Club office folders.
- Access to Club employees and leasing personnel details is restricted on a need-to-know basis to the Club Secretary & Treasurer. We log the following: Name, Address, DOB, personal mobile number, PPS No., Email address, emergency contact name and phone number, P45 details, and bank account details.
- Information from Club visitors is deemed to be of a temporary nature and is deleted when their interactions with the Club are completed.
- Club text messaging/newsletters/e-mails and Club's website will from time-to-time inform members of Club competitions and their results; Interclub Competitions and results; Promote Club's social activities and media events: Notify members of their annual subscription and other general Club information.

- The names of members, who take out a **Golfsure Personal** insurance and a **Buggy Insurance** policy through the Club, must be forwarded to the relevant insurance broker.
- Golf Ireland will annually seek names, mobile contact numbers and email addresses of the principal Club officers of the relevant year as well as the names and email addresses of Club's Designated Liaison Person, Junior Convenor(s), Competition Secretaries, Club Communication Officer and Club PGA Professional.
- Personal bank and credit and debit card details, when given to a Club official/office employee, while making a card payment transaction to the Club, are not to be recorded in any manner. Card numbers and other card details are keyed-in during the process of making the card transaction.
- If Personal Data is obtained through Club surveys, it will be treated as confidential and data will not be used so as to identify the data subject.

Data Breaches:

- If a data breach is made known to the Club and as it takes its data protection responsibilities seriously, it will comply with its obligations regarding data protection breaches under **Data Protection Law**. The General Data Protection Regulation obliges Data Controllers to notify the Data Protection Commission and affected 'data subjects' in the case of certain types of personal data security breaches.

Appendix 1

The law defines personal data as “*data relating to a living individual who is or can be identified from the data or from the data in conjunction with other information that is in, or is likely to come into, possession of the data controller*”.

The Data Protection Acts also applies to information or data stored on a computer or an organised paper filing system about living people. Persons who hold or have access to personal data (manual or otherwise) are bound by the provisions of the DPA.

The Eight Principles of Data Protection

- ***Fair and lawful. ...***
- ***Specific for its purpose. ...***
- ***Be adequate and only for what is needed. ...***
- ***Accurate and up to date. ...***
- ***Not kept longer than needed. ...***
- ***Take into account people's rights. ...***
- ***Kept safe and secure. ...***
- ***Not be transferred outside the European Economic Area....***

Appendix 2

As a rule, Club officials must correspond, (including text messaging), with the parents/guardians of Juvenile members of the Club using the supplied addresses & phone numbers of their parent/guardian. Juveniles are not to be contacted directly. Any information of a personal or medical nature must be kept strictly confidential unless the welfare of a Juvenile requires the passing on of this information. Confidential information, except where abuse is suspected, must not be divulged to a third party without the expressed permission of the family. Juveniles have a right to privacy and therefore their consent will be sought in relation to the use of personal data including images. Parental consent is also required and the Club must receive signed permission from the player's parents/guardians for the recording of photographic and recorded images etc. as part of the player's membership application process. Information will be provided as to how and for what purpose images will be used. (See Club Policy '**Golf for Young Members**'). A refusal of consent will not in any way limit a juvenile's participation in activities. The Club will take all necessary steps to ensure that young people are protected from the inappropriate use of their images in media publications, on the internet and elsewhere. This is not to prohibit

parents/guardians taking photographs of their juvenile member but to ensure that best practice is in place wherever and whenever photographs or recordings occur.

Appendix 3

1). To provide former members with up-to-date information about Club Membership, e.g. special membership offers, with a view to re-joining. 2) On reaching an age as determined by the Club, senior members with 15 years continuous Club membership qualify for a reduced subscription rate. When members resign with 15 years or more continuous Club membership and subsequently wish to re-join, the Executive Committee may examine their former membership record and decide if/or when a reduced subscription will apply.