

INTRODUCTION

Welcome to our privacy notice.

We respect your privacy and are committed to protecting your personal information, which we call "personal data". This privacy notice will tell you how we look after your personal data and about your privacy rights. It supplements any other notices and is not intended to override them.

We have tried to be brief and clear. We are happy to provide any additional information or explanation.

WHO WE ARE

Data Controller (Golf Course Owner) (referred to as "we/us/our")	Malcolm / Richard Salt		
Name or title of Data Protection Manager:	Malcolm Salt acts as the Data Protection Manager for the business		
Address:	Horsley Lodge GC, Smalley Mill RD, Horsley, Derbyshire, DE21 5BL		
Telephone:	Clubhouse 01332 780838		
Email:	enquiries@horsleylodge.co.uk		

Office (ICO) (www.ico.org.uk). But we would appreciate the chance to deal with your concerns first.

CHANGES

This version was instigated on 16th May 2018. Any changes will be made available. It is important that the personal data we hold about you is accurate and current. Please keep us informed of any changes.

HOW WE COLLECT YOUR PERSONAL DATA

You may give us data orally or by filling in forms or by corresponding with us by post, phone, email or otherwise, for example when you:

- enter into a contract with us for a membership or other booking or contact us about doing so;

- contact us about any contract we have with you;
- request marketing or membership forms to be sent to you;
- enter a competition, promotion or survey;
- give us some feedback.

We may also receive personal data about you from third parties and public sources, including other customers when they interact with us and (if applicable):

Other golf associations and clubs	Information from other golf clubs, associations or handicapping authorities about your playing records at other clubs or match results
Our Members' section club	As a business we also receive information from the members' sections and committees about your play and provide information as necessary to them. There is a privacy requirement for the way in which the members' committee handles your information

HOW WE USE YOUR DATA

We will only use your personal data when the law allows us to.

We have set out below how and why we plan to use your personal data.

Information we have to share about you as a member of the golf club	We are required to provide details about golfers' membership to County and England Golf Associations and to share information about your golf handicapping and general play. We keep this anonymous to protect your identity as far as possible
To register you with our business	Performance of a contract with you
<p>To perform any contract with you including:</p> <p>(a) Managing payments, fees and charges</p> <p>(b) Collecting and recovering money owed to us</p> <p>(c) Addressing any breach</p>	<p>(a) Performance of a contract with you and applying any credits to your account and monitoring details of your golf usage</p> <p>(b) Necessary for our legitimate interests where fees are, for example, paid through a third party currently Premium Credit</p> <p>(c) Necessary for our legitimate interests (to ensure compliance with contract terms)</p>
To manage our relationship with you which will include:	(a) Performance of a contract with you

<p>(a) Notifying you about changes to our terms or privacy policy</p> <p>(b) Notifying you about changes to our business which are relevant to you</p>	<p>(b) Necessary to comply with a legal obligation</p> <p>(c) Necessary for our legitimate interests (to keep our records updated and to study how people use our business)</p> <p>(d) Monitoring your golf play and keeping records of play for insurance purposes and for other legitimate reasons</p>
<p>To administer and protect our business and our website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)</p>	<p>(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise)</p> <p>(b) Necessary to comply with a legal obligation</p>
<p>To make suggestions and recommendations to you about goods or services that may be of interest to you</p>	<p>Necessary for our legitimate interests (to develop and grow our business) and in particular telling you about social events, coaching and competitions at the club</p>
<p>Asking you to partake in a review, prize draw, competition or complete a survey</p>	<p>Necessary for our legitimate interests and to promote participation in golf (to study how people use our business, to develop and grow our business)</p>
<p>To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you</p>	<p>Necessary for our legitimate interests (to study how people use our business, to develop and grow our business and to inform our marketing strategy). Details are considered necessary in order to monitor and arrange tee times for competitions, for members generally and for visitors.</p>
<p>To use data analytics to improve our website, products/services, marketing, relationships and experiences</p>	<p>Necessary for our legitimate interests (to keep our website updated and relevant, to develop our business and to inform our marketing strategy)</p>
<p>As a member of the golf club you are automatically a member of the members' section which is operated by committees</p>	<p>We give certain information about you, namely your address, phone and email address to the committee that operates competitions at the club. Should you wish to limit this we will of course do so</p>

PROMOTIONAL OFFERS FROM US

We may use your personal data to form a view on what we think you may want or need, or what may be of interest to you, in particular social events or competitions at the club or other golfing events.

We may then use your personal data to send you marketing communications from us if you have requested information from us or purchased goods or services from us or if you provided us with your details when you entered a competition or registered for a promotion and, in each case, you have not opted out of receiving that marketing.

OTHER MARKETING

We will get your express opt-in consent before we use your personal data for any other marketing purpose or share it with any third party for marketing purposes.

OPTING OUT

You can ask us or third parties to stop sending you marketing messages at any time by contacting our DPM and in particular by emailing us at reception@horsleylodge.co.uk

CHANGE OF PURPOSE

Please note that we may process your personal data without your knowledge or consent where this is required by law.

However, if we need to use your personal data for a new purpose and the law allows us to do so, we will notify you and explain the legal basis for our actions.

VISITORS TO OUR WEBSITE

If we want to collect personally identifiable information through our website, we will be up front about this and make clear that we are collecting personal information

When someone visits our website, we may use a third-party service to collect standard internet log information and details of visitor behaviour patterns. We do this to find out things such as the number of visitors to the various parts of the site. This information is only processed in a way which does not identify anyone.

THIRD-PARTY LINKS

Our website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit. In particular details about your golf performance and handicapping may be available on a public website which is not under our control

MEMBERS' COMPETITION NEWS

Our website may include information provided and put on the website about competitions at the golf club and members' playing records may appear on this. This is controlled by the club committees and if you are not happy for your name and competition records to appear

on the members' section of the website you should make this known to the organising committee. We ask all members to agree to their competition records being displayed

IF YOU CONTACT US VIA SOCIAL MEDIA

Name of social media	TWITTER – we occasionally send out twitter information about the club but this specifically does not include name or details of members
	FACEBOOK – the club puts up information about events at the club which may include photos of adult competitors.
Retention period for messages	If you contact us via Twitter or Facebook we will assume you are happy for your comments to be displayed

IF YOU FAIL TO PROVIDE PERSONAL DATA

If you do not provide personal data to us and this would prevent us from performing the contract we have or are trying to enter into with you, we may have to cancel our contract. We will notify you if this is the case. We need to have details of members' addresses and phone numbers to make contact with you regarding subscription. We need to have details of emergency contacts in case of accident while you are on the course and to have details of parents/guardians and contact details for all children.

DISCLOSURES OF YOUR PERSONAL DATA

We may share your personal data with third parties to help us run our business or carry out our obligations to you:

Name of party	Reason for sharing information
County and England Golf Unions Name of part	Details of your play and handicapping records if required. We attempt to keep records anonymous to protect the details of individual golfers Reason for sharing information
Service providers for IT and system administration	Performance of a contract with you. We need to share details of your payments to us to credit your loyalty cards and for Points to Play members to update your allowances. This is necessary for our legitimate interests
Our professional advisers including lawyers, bankers, auditors and insurers.	Necessary for our legitimate interests (complying with our legal obligations to keep records for our tax and VAT) and necessary to protect users of the premises and the business for insurance purposes
HM Revenue & Customs, regulators	Necessary for our legitimate interests (complying with our legal obligations). To keep records required by HMRC for our VAT and Tax

and other authorities	purposes, and by our insurers
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We may also share your personal data with any third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy notice.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

INTERNATIONAL TRANSFERS

We do not transfer your data outside the European Economic Area unless IT services provide/use cloud-based web or email services outside the EEA

DATA SECURITY

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

HOW LONG WILL WE USE YOUR PERSONAL DATA FOR?

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements and in particular the requirements of HMRC and our insurers.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

You can ask us about the retention periods for different aspects of your personal data by contacting our DPM.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

YOUR LEGAL RIGHTS

You have the right to:

Request access to your personal data (commonly known as a “data subject access request”). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request. Please note that the members’ committee, members and organisers of the club competitions are a separate entity to the business of Horsley Lodge Golf Club and specific requests about competitions should be made to them direct.

Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data’s accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

Children

We do not knowingly collect data relating to children other than junior members and

children attending junior coaching or initiatives. In all cases we ask parents or guardians to give permission for the data to be given and retained. We are at times required to give details about junior golfers to national and county organisations but we ask parents to approve this before it is given. We endeavour to protect all children from having their photos taken but this may happen in the case of children playing in competitions at the club

No fee usually required You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

Malcolm and Richard Salt

May 16th 2018

HORSLEY LODGE LIMITED PRIVACY NOTICE FOR EMPLOYEES, WORKERS AND CONTRACTORS

INTRODUCTION

Welcome to our privacy notice for current and former employees, workers and contractors.

We respect your privacy and are committed to protecting your personal information, which we call "personal data". This privacy notice will tell you how we look after your personal data and about your privacy rights.

This notice does not form part of any contract. It supplements any other notices and is not intended to override them.

We have tried to be brief and clear. We are happy to provide any additional information or explanation.

WHO WE ARE

Data Controller (Golf Course Owner) (referred to as "we/us/our")	Malcolm / Richard Salt		
Name or title of Data Protection Manager:	Malcolm Salt acts as the Data Protection Manager for the business		
Address:	Horsley Lodge GC, Smalley Mill RD, Horsley, Derbyshire, DE21 5BL		
Telephone:	Clubhouse 01332 780838		
Email:	enquiries@horsleylodge.co.uk		

CHANGES

This version was instigated on 16th May 2018. Any changes will be made available
It is important that the personal data we hold about you is accurate and current. Please keep us informed of any changes.

HOW WE COLLECT YOUR PERSONAL DATA

We collect personal data through application and recruitment processes, either directly from candidates or sometimes from an employment agency or background check provider. We may sometimes collect additional information from third parties.

We may also receive personal data about you from third parties and public sources, including:

Who	When
Former employers and other referees	We may ask you for permission to take a reference from former employers and other referees as a condition of a contract or offer to you.
Credit reference agencies	We may make a credit reference check on our contractors.

We will collect additional personal information in the course of job-related activities throughout the period of you working for us.

WHAT PERSONAL DATA DO WE COLLECT?

Personal Data	Yes	No
Personal contact details such as name, title, addresses, telephone numbers and personal email addresses	✓	
Date of birth	✓	
Gender	✓	
Marital status and dependants		✓
Next of kin and emergency contact information	✓	
National Insurance Number	✓	
Bank account details, payroll records and tax status information	✓	
Pay, holiday and benefits information	✓	
Start date	✓	
Location of employment or workplace – all at Horsley Lodge	✓	
Copy of driving licence – only if driving is part of employment		

Recruitment information including copies of right to work documentation, references and other information included in a CV or cover letter or as part of the application process	✓	
Employment records including job titles, work history, training records and professional memberships	✓	
History of pay and benefits received	✓	
Performance information	✓	
Disciplinary and grievance information	✓	
CCTV footage and other information obtained through electronic means such as swipecard records, where used	✓	
Information about your use of our information and communication systems	✓	
Photographs	✓	
SENSITIVE PERSONAL DATA	Yes	No
We may also collect, store and use the following categories of more sensitive personal information		
Information about your race or ethnicity, religious beliefs, sexual orientation and political opinions		✓
Trade union membership		✓
Information about your health, including any medical condition, health and sickness records	✓	
Genetic information and biometric data		✓
Information about criminal convictions and offences. Where appropriate, we will collect information about criminal convictions as part of the recruitment process or we may be notified of such information directly by you in the course of you working for us <i>The link below explains when a criminal record check may be made with the Disclosure and Barring Service</i> https://www.gov.uk/guidance/dbs-check-requests-guidance-for-employers This is not possible in most cases at Horsley Lodge	✓	

HOW WE USE YOUR PERSONAL DATA

We will only use your personal data when the law allows us to. In each case we may rely on three reasons to do so. These are:

- (a) The performance of a contract with you.
- (b) Because it is necessary to comply with a legal obligation.
- (c) Because it is necessary for our legitimate interests.

These three reasons for using your personal data overlap and there may more than one ground to justify our use of your personal information on any occasion.

Purpose/Activity	Lawful basis for processing (see above)	Basis of legitimate interest, where applicable
Making a decision about your appointment or recruitment	a, b & c	To appoint and retain people who are able to help us develop and grow our business. To treat you fairly.
Deciding the terms on which you work for us	a, b & c	To appoint and retain people who are able to help us develop and grow our business. To treat you fairly.
Checking you are legally entitled to work in the UK	a, b & c	To appoint and retain people who are legally entitled to work in the UK.
Paying you and deducting any tax or national insurance due	a, b & c	To comply with the law.
Administering our contract	a, b & c	To retain people who are able to help us develop and grow our business. To treat you fairly. To ensure that you meet your obligations to us and that we are able to address any situation in which you do not.
Business management and planning including accounting and auditing	c	To help us develop and grow our business.
Managing performance including carrying out performance reviews and setting targets	a, b & c	To retain people who are able to help us develop and grow our business, To treat you fairly. To ensure that you meet your obligations to us and that we are able

		to address any situation in which you do not.
Making decisions about pay reviews and other benefits.	a, b & c	To retain people who are able to help us develop and grow our business. To treat you fairly.
Assessing qualifications for a job or task including decisions about promotion	a, b & c	To appoint and retain people who are able to help us develop and grow our business. To treat you fairly.
Gathering evidence for possible grievance or disciplinary hearings	a, b & c	To retain people who are able to help us develop and grow our business. To treat you fairly. To ensure that you and your work colleagues meet your obligations to us and that we are able to address any situation in which you or they do not.
Making decisions about your continued employment or engagement	a, b & c	To ensure that that we retain people who are able to help us develop and grow our business. To treat you fairly. To ensure that you meet your obligations to us and that we are able to address any situation in which you do not.
Education, training and development requirements	a, b & c	To ensure that that we equip you to help us develop and grow our business.
Dealing with legal disputes involving you or others connected to our business, including accidents at work	b & c	To protect our legitimate interests and those of others in legal disputes.
Ascertaining your fitness to work	a, b & c	To appoint and retain people who are able to help us develop and grow our business. To treat you fairly. To ensure that you meet your obligations to us and that we are able to address any situation in which you do not.
Managing sickness absence	a, b & c	To appoint and retain people who are able to help us develop and grow our business. To treat you fairly. To ensure that you

		meet your obligations to us and that we are able to address any situation in which you do not.
Complying with health and safety obligations	a, b & c	To keep you and your colleagues healthy and safe at work.
To prevent fraud	a, b & c	To prevent fraud and to take appropriate action if it takes place, including action against anyone responsible.
To monitor your use of our information and communication systems to ensure compliance with our IT policies	a, b & c	To ensure that you meet your obligations to us and that we are able to address any situation in which you do not. To ensure that we comply with the law.
To ensure network and information security, including preventing unauthorised access to our computer and electronic communications systems and preventing malicious software distribution	a, b & c	To keep out network and information secure and to take appropriate action if it is breached, including action against anyone responsible.
To conduct data analytics studies to review and better understand employee retention and attrition rates	c	To retain people who are able to help us develop and grow our business.
Equal employee monitoring	a, b & c	To ensure meaningful equal opportunity monitoring and reporting.
Providing the benefits to you which are listed below	a, b & c	To appoint and retain people who are able to help us develop and grow our business. To meet our obligations to you.

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Relevant benefits	We are obliged to keep records about our pension scheme and to administer your membership if you join the Smart Pension scheme. We also keep records of any loyalty card you hold so that we can allow you the appropriate discount for any purchases you make at the club
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HOW WE USE YOUR SENSITIVE PERSONAL DATA

Sensitive personal data	Lawful basis for use	Any other basis of legitimate interest, where applicable
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Information relating to absence, which may include sickness absence or family related leave	a, b & c	To comply with employment or other laws. To ensure your health and safety in the workplace and to assess your fitness to work, to provide appropriate workplace adjustments, to monitor and manage sickness absence and to administer benefits.
Information about your physical or mental health or disability	a, b & c	To ensure your health and safety in the workplace and to assess your fitness to work, to provide appropriate workplace adjustments, to monitor and manage sickness absence and to administer benefits
Information about your race or ethnicity, religious beliefs, sexual orientation and political opinions		We do not keep this information unless you ask us to process it
Trade union membership information		We do not keep this information unless you ask us to process it and then only to comply with employment law obligations.
Information about criminal convictions and offences	a, b & c	To help us make a fair decision about your appointment or recruitment or about your continued employment or engagement, where the information is relevant. Where it is necessary in relation to legal claims. Where it is necessary to protect your interests (or someone else's interests) and you are not capable of giving your consent, or where you have already made the information public.

We do not need your consent to use your sensitive personal data in these ways. However, in limited circumstances, we may approach you for your written consent to allow us to process certain particularly sensitive data. If we do so, we will provide you with full details of the information that we would like and the reason we need it, so that you can carefully consider whether you wish to consent. You should be aware that it is not a condition of your contract with us that you agree to any request for consent from us.

CHANGE OF PURPOSE

Please note that we may process your personal data without your knowledge or consent where this is required or permitted by law.

However, if we need to use your personal data for a new purpose and the law allows us to do so, we will notify you and explain the legal basis for our actions.

IF YOU FAIL TO PROVIDE PERSONAL DATA

If you fail to provide certain information when requested, we may not be able to perform the contract we have entered into with you (such as paying you or providing a benefit), or we may be prevented from complying with our legal obligations (such as to ensure the health and safety of our workers).

DISCLOSURES OF YOUR PERSONAL DATA

We may share your personal data with third parties to help us run our business or carry out our obligations to you:

Name	Lawful basis for processing including basis of legitimate interest	Names of third parties, where relevant
Service providers for IT and system administration Payroll Pension Other employment benefits	Performance of a contract with you Necessary for our legitimate interests (performing the contract, using your data as we have described in this notice).	Payroll – Sibbalds LTD
Our professional advisers including lawyers, bankers, auditors and insurers.	Necessary for our legitimate interests (complying with our legal obligations, helping us develop and grow our business).	*Sibbalds our accountants, *NFU our insurers *NatWest bank
HM Revenue & Customs, regulators and other	Necessary for our legitimate interests (complying with our legal obligations).	Where required

authorities		
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We may also share your personal data with any third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy notice.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

INTERNATIONAL TRANSFERS

We do not transfer your data outside the European Economic Area unless IT services provide/use cloud-based web or email services outside the EEA

AUTOMATED DECISION MAKING

Automated decision-making takes place when an electronic system uses personal information to make a decision without human intervention. We do not envisage that any decisions will be taken about you using automated means. We will notify you in writing if this position changes.

DATA SECURITY

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

HOW LONG WILL WE USE YOUR PERSONAL DATA FOR?

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, insurance or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

You can ask us about the retention periods for different aspects of your personal data by contacting our DPM.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

YOUR LEGAL RIGHTS

You have the right to:

Request access to your personal data (commonly known as a “data subject access request”). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data’s accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to perform the contract we have entered into with you (such as paying you or providing a benefit), or we may be prevented from complying with our legal obligations (such as to

ensure the health and safety of our workers).

No fee usually required You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO) (www.ico.org.uk). But we would appreciate the chance to deal with your concerns first.

HORSLEY LODGE GOLF CLUB GDPR PROCESS - SUMMARY

1. We have accepted and ensure our employees accept that under Article 16(1) of the Treaty of the Functioning of the European Union (TFEU) that everyone has the right to protection of the personal data concerning him or her and we have explained the broad detail of the GDPR to all those who work for us. We accept that the right of the individual can be summarised as including:- The right to be informed what data is held, the right of access to see the data, right to have it rectified, right to have the data erased unless it is a legal requirement to keep it, a right to restrict the processing of their data, a right to data portability and a right to object to the use of data.
2. We have considered the need to process and hold data with regards to consent to hold it, contracts, legal obligations, vital interests of the business, public requirements, legitimate interests of the business and the holding of any criminal offence data relating to employees
3. We have registered with the Information Commissioner's Office and paid the appropriate fee for 2018/9 under licence reference A8312745
4. We have considered the appropriate Articles and Recitals in the General Data Protection Regulation; we have familiarised ourselves with the

process as required for a small organisation with fewer than 250 employees. In particular have considered the following Key Issues

- The process of consent as a positive requirement.
 - The appointment of a Data Protection Officer
 - The method of any we use for email marketing
 - Encryption of information we are required to keep but not actively use
 - The information obligations and how we store information
 - Order processing
 - Personal data
 - Privacy design and data privacy impact assessment
 - Our records of how we process data
 - The right of access for those about whom we hold data
 - The right to be forgotten for those about whom we hold data
5. We have taken steps to ensure that the consent is a positive function and not an opt-out. Where we contacted customers for whom we have email addresses to ask them to opt in we have satisfied ourselves that we had a previous soft opt-in or opt-out process in place and taken steps to ensure we comply with Recital 32
 6. We have appointed one of our partners, Malcolm Salt as the Data Protection Officer for the firm although we do not fall into the categories requiring this appointment
 7. We have taken steps to ensure that there is no form of email marketing to any party unless we have a positive consent to do so and that this was only obtained from those who had already given permission via a soft opt-in/opt-out process from earlier contact
 8. We have taken steps to consider where encryption may be necessary and possible for old information which is no longer actively needed
 9. We have done an audit of the information obligations of the business and considered what we are required to hold for tax, insurance, contract and employment purposes and considered how we remove or destroy information which is no longer needed
 10. We have considered how we process information to ensure that it is kept securely with the only access to it by those who are aware of GDPR regulations and have a valid reason for accessing it for the needs of the business
 11. We have considered what personal data we actually need for the functions of the business and concluded that this is limited to names, contact details for members and employees, by postal address, phone

number and email (where possible), emergency contact details for those playing on the golf course, email and phone details for those booking to play on the course and contact details for those with whom we form contracts for functions and golf societies or other events.

12. As far as personal data of children is concerned we have taken steps to comply with Article 8 and the processing and consent for children under-16 and in relation to contracts for their membership, coaching and competitions
13. We have put in place a Customer Privacy Notice which is displayed at the premises and we have put in place an Employee and Contractor Notice which is in the process of being explained and signed by employees and those who also work at the premises.
14. Privacy by Design – we have considered this and familiarised ourselves with Article 46 to ensure technical and organisational measures (TOMs) are already in place within the data processing through technology system in place through whom information about members and visitors is processed
15. Data Privacy Impact Assessments – we have assessed our processes by reference to Article 29 and do not consider that we have any high risk areas under Article 35 but we are aware of the process and requirements for DPIA
16. We have considered the way in which we process data to ensure it is kept confidential and suitable to the needs of the firm and legal requirements
17. We have put in place a Customer Privacy Notice which explains the rights of those about whom we hold data and made it clear about their right of access to inspect what we hold
18. Within the Customer Privacy Notice we have made it clear that there is a right to be forgotten and we have explained why, for legal, tax or insurance needs it may not always be possible to remove certain data

HORSLEY LODGE GOLF CLUB 12 POINT PLAN

We have put in place the 12 point plan outlined by the ICO in preparation for the General Data Protection Regulation

Awareness – we have made staff and decision makers aware of the way in which the law is changing and the impact of GDPR. We have looked at any areas which may be at risk and identified that the members of the club, who are our customers, communicate with each other regarding their golf and

social events and have made them aware that they cannot use our customers' data

Information we hold – we have done an information audit of the information we hold. We hold information about members in paper format as their membership renewal forms; we also have them on a ESP data base which shows their accounts with us and their golf usage; we have a category of member known as Points to Play where records of their upgrades are held manually and also on the till system which allocates or deducts points with payment and playing; we hold information about past members with paper records and also records on our accounting system; we hold paper records for payments from members and we also hold paper records of visiting parties to the club; we hold computer email and phone records of those who visit the club to play golf when they book tee times and make payments; we retain these records on the accounting system and also for insurance purposes; we keep files on employees with details of their contacts, pay and employment records, holiday pay and sickness absence; we hold that information for as long as required by HMRC and insurers; we hold information of those who contract with us to have functions at the club

Communicating privacy information – we have in place a Customer Privacy Notice and will keep this up to date, having signed up to information from the ICO. We are taking steps to ensure this is clearly displayed and available We have put in place an Employees and Contractors Privacy Notice and are taking steps to ensure this is signed by all relevant employees and those who work at the firm's premises. We have read the ICO's Privacy notices code of practice and have satisfied ourselves that we have complied with those.

Individuals' rights – we have considered what we have in place and to respect the right of individuals to be informed, right of access, right of rectification, right of erasure, right to restrict processing, right to object and the right not to be subject to automated decision making, including profiling. We were already compliant aware of these. We have considered the right to portability of information provided to a controller and are satisfied that this does not apply to us. We have made the parties who access our customers' information – IG, BRS and for some customers – Premium Credit – aware of our protection of our clients' data by them. We are aware that in the event of a request by a customer or employee or anyone for whom we hold information we are

obliged to provide this free of charge unless the request is repetitive or unreasonable.

Subject access requests – we have planned how we can deal with any requests for information and know that we cannot generally charge to disclose the information unless it is unreasonable, excessive or repetitive. We understand that the compliance time has been reduced from the old 40 days under the DPA to one month. If for any reason we refuse the request we have to say why we are refusing, make that statement early and certainly within one month and we have to advise the person making the request of their rights to refer this to the ICO. We have also taken steps to ensure that all employees or other workers at the premises or anyone who might receive a request for information is aware of the urgency of dealing with any requests and refers them immediately to Vivien Saunders, our nominated Data Protection Officer

Lawful basis for processing personal data – we have identified why we keep the information and also why we process it. We have dealt with the reasons we process data within the Customer Privacy Notice and also within the Employee and Contractor Privacy Notice. We take the view that we process the data for the purposes of the contract with clients in order to establish our financial records and for insurance purposes and for tax purposes. We also maintain sufficient information to notify those who have positively consented to be kept informed about the activities at the club for sports and social events. For employees and past employees we have satisfied ourselves that we only process the data which is necessary for their employment records and for our tax, accounting and insurance purposes and to ensure we have up-to-date information of next of kin or others in the event of emergencies. We are aware that clients and those for whom we hold information may change their consent, in which case we will speedily remove them where possible from any records

Children – we have in place a form for junior members under the age of 19 to have a parent or guardian authorise us to make contact with the parent or child for golf competitions, membership updates and coaching. We consider it is necessary to have the dates of birth of children to ensure they compete in the correct age group of competitions and also because we have a different subscription levels for different age groups. We have considered the general rule of GDPR that this allows children of 16 to consent to the processing of their own data and that in the UK this may be lowered to 13. However because

of the issues of having licensed premises and the general child protection rules relating to sport we still require parental authority for all juniors. We do however accept the right of children over 13 to be able to access their own data. We take the rights of children seriously in particular because the premises cover 200 acres.

Data breaches – we have considered the likelihood of data breaches and consider there is a very low risk, other than sharing mobile phone numbers or email addresses by members to other members. We are taking what steps we can to avoid this. We are aware that if there is any breach of data for any reason we should notify anyone who is affected.

Data Protection by Design and Data Protection Impact Assessments – we are aware of the requirements and consider that there has always been a suitable privacy by design approach at the business. We have considered the issue of DPIAs and understand that in the event of adopting new technology a DPIA would be required. We do not fall in the category where DPIAs are mandatory.

Data Protection Officer – we are not in the category requiring formal designation of a DPO. We have however nominated one of our partners, Vivien Saunders, to take responsibility for data protection compliance and she is shown in the Privacy Statements as the person in the firm who is responsible for compliance and with whom contact should be made. She is responsible for keeping up to date with knowledge and legislation.

International – we do not operate within any other EU member state.