



## **THE HALIFAX, HUDDERSFIELD AND DISTRICT UNION OF GOLF CLUBS**

TO PROMOTE, ADMINISTER AND ENCOURAGE AMATEUR GOLF WITH PARTICULAR EMPHASIS ON SCRATCH AND JUNIOR GOLF

# Privacy Policy

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# THE HALIFAX, HUDDERSFIELD AND DISTRICT UNION OF GOLF CLUBS

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## INTRODUCTION

We are committed to respecting your privacy. This notice explains how we may use personal information collected before, during and after our relationship with you. This notice applies to you if you have registered to become or currently are a member, a competitor, a participant in coaching or you are requesting a service from us. This notice explains how we comply with the law on data protection, what your rights are for the purposes of data protection and who will be the controller of any of your personal information.

All references to 'we, our or us' in this privacy notice are to **The HALIFAX, HUDDERSFIELD and DISTRICT UNION of GOLF CLUBS** the postal address of which is: **Halifax West End Golf Club, Paddock Lane, Halifax, HX2 0NT.**

Email: [dpo@hhdugc.org.uk](mailto:dpo@hhdugc.org.uk)

References to '**you, the member, the customer or the player**' refer to anyone who requests a service from us, enters a competition administered by us, takes part in coaching, player development or becomes a customer of ours for any reason.

We have appointed a Data Controller to oversee our compliance with data protection laws who has overall responsibility for data protection compliance in our organisation. Contact details are set out in the 'Contacting Us' section at the end of this notice.

## PERSONAL INFORMATION WE MAY COLLECT FROM YOU

Depending on the type of service or membership you register for, you may initially provide us with or we may obtain from you **personal information**, such as, but not limited to:

- personal contact details that allows us to contact you directly such as name, title, email addresses and telephone numbers;
- date of birth;
- gender;
- membership start and end date;
- 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;
- use of and movements through our online portal, passwords, personal identification numbers, IP addresses, usernames and other IT system identifying information;
- records of your attendance at any events hosted by us;
- images in video and/or photographic form and voice recordings;
- your marketing preferences so that we know whether and how we should contact you;

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- identification documents such as passport and identity cards;
- details of any golf club membership;
- details of next of kin, family members, coaches and emergency contacts;
- records and assessment of any player rankings, grading or ratings, competition results, details regarding events/matches/games attended and performance (including that generated through player pathway programmes);
- any disciplinary and grievance information;

## SPECIAL CATEGORIES OF PERSONAL INFORMATION

We may also collect, store and use the following '**special categories**' of more sensitive personal information

regarding you:

- information about your health, including medical conditions, health, sickness and medical records and health professional information; and
- information about criminal records for the purposes of safeguarding young people and vulnerable adults.

We may not collect all of the above types of special category personal information. In relation to the special category personal data that we do process we do so on the basis that:

- the processing is necessary for reasons of substantial public interest, on a lawful basis;
- it is necessary for the establishment, exercise or defence of legal claims;
- it is necessary for the purposes of carrying out the obligations and providing appropriate advice to medical professionals in case of emergency;
- based on your explicit consent;

In the table below we refer to these as the 'special category reasons for the processing of your personal data.'

## WHERE WE COLLECT YOUR INFORMATION

We typically collect personal information about our members when you: become a member, enter a competition, request a service from us, purchase any services or products we offer, make a query and/or complaint, or correspond with us by phone, e-mail or in some other way.

We may also collect personal information about you from any third party references you provide as part of your service request.

If you are providing us with details of referees, next of kin, beneficiaries, family members and emergency contacts they have a right to know and be aware of what personal

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information we hold about them, how we collect, use it and may share that information. Please share this privacy notice with those whom you feel are sufficiently mature to understand it. They have the same rights as set out in the **'Your rights in relation to personal information'** section below.

## USES MADE OF THE INFORMATION

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.

<b>Purpose</b>	<b>Personal information used</b>	<b>Lawful basis</b>
<b>To administer any membership you have with us and managing our relationship with you, including dealing with payments and any support, service or product enquiries made by you.</b>	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.
<b>To arrange and manage any contracts for the provision of any services or products.</b>	Contact details, transaction and payment information and 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.
<b>To send you information which is included within your customer benefits, including details about advanced information on competitions and events, partner offers and any golf related updates.</b>	Contact and player details.	This is necessary to enable us to properly manage and administer our service contract with you.
<b>To send you other marketing information we think or feel 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.</b>	Contact details and marketing preferences.	Where you have given us your explicit consent to do so.

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Purpose	Personal information used	Lawful basis
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.
Retention of records.	All the personal information we collect.	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 our services to you and in some cases we may have legal or regulatory obligations to retain records. 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.  For criminal records history we process it on the basis of legal obligations or based on your explicit consent.
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 analysis 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.

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Purpose	Personal information used	Lawful basis
For the purposes of promoting the sport, our events and other opportunities.	Images in video and/or photographic form.	We have a legitimate interest in doing so to promote participation in the sport.
To comply with health and safety requirements.	Records of attendance, other information obtained through electronic means and medical information about your health.	We have a legal obligation and a legitimate interest to provide you and other customers of our organisation with a safe environment in which to participate in sport.  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 administer your attendance at any courses or programmes you sign up to	All contact and personal details, transaction and payment data.  Details of any county membership and performance data.	This is necessary to enable us to register you on to and properly manage and administer your attendance or participation in a programme.
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.

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Purpose	Personal information used	Lawful basis
To use information about your physical or mental health (including any injuries) or disability status, to ensure your health and safety, to assess your fitness to participate in any events or activities we host and to provide appropriate adjustments to our sports 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;	<p>We have a legitimate interest in doing so to provide a safe and fair environment for all customers and participants in events and to ensure the effective management of any disciplinary hearings, appeals and adjudications.</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> <p>For criminal records history we process it on the basis of legal obligations or based on your explicit consent.</p>
For the purposes of equal opportunities monitoring.	Name, title, date of birth gender, information about your race or ethnicity and health and medical information;	<p>We have a legitimate interest to promote a sports environment that is inclusive, fair and accessible.</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 comply with legal obligations, for example, regarding 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.



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Purpose	Personal information used	Lawful basis
Cookies.	Information that you have personally supplied during use of our website.	<p>Certain parts of our website use 'cookies' to keep track of your visit and to help you navigate between sections. A cookie is a small data file that certain websites store on your computer's hard drive when you visit such websites. Cookies can contain information such as your user ID and the pages you have visited. The only personal information a cookie contains is information that you have supplied.</p> <p>We use cookies on our website to enable us to deliver content that is specific to your interests and gives us an idea of which parts of the website you are visiting and to recognise you when you return to the website. Reading cookies does not give us access to other information on your computer's hard drive and our website will not read cookies created by other websites that you have visited.</p> <p>You may refuse to accept cookies by activating the setting on your browser which allows you to refuse the setting of cookies. If, however, you select this setting you may be unable to access certain parts of the website. Unless you have adjusted your browser settings so that it will refuse cookies, our system will issue cookies when you access the website.</p>

For some of your personal information you will have a legal, contractual, other requirement, or obligation for you to provide it to us. If you do not provide us with the requested personal information we may not; be able to admit you as a member, be able to properly perform our contract with you, or comply with legal obligations. For other personal information 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.

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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.

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 that information to the extent that we are entitled to do so on a basis other than your consent. Withdrawing consent may also have the same effects as not providing the information in the first place, for example we may no longer be able to provide certain benefits or services to you.

## EMAIL, POST and SMS MARKETING

From time to time, we may contact you by email, post or SMS with information about golf related 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 let us know at any time that you do not wish to receive marketing messages by emailing us at [dpo@hhdugc.org.uk](mailto:dpo@hhdugc.org.uk) You can also unsubscribe from our marketing by clicking on the unsubscribe link in the marketing messages we send to you.

## DISCLOSURE OF YOUR PERSONAL INFORMATION

We share personal information with the following parties:

- Any party approved by you.
- Any governing or regional bodies for golf: to allow them to properly administer the sport on a local, regional and national level.
- Other golf related service providers: for example competition and handicap management software providers, email marketing specialists, payment processors and mailing services.
- The Government or our regulators: where we are required to do so by law or to assist with their investigations or initiatives.
- Police, law enforcement and security services: to assist with the investigation and prevention of crime and the protection of national security.

## TRANSFERRING YOUR PERSONAL INFORMATION INTERNATIONALLY

The personal information we collect may be transferred to and stored in countries outside of the UK and the European Union. Some of these jurisdictions require different levels of protection in respect of personal information and in certain instances the laws in those countries may be less protective than the jurisdiction you are resident in. We will take all reasonable steps to ensure that your personal information is only used in accordance with this privacy notice, applicable data protection laws, is respected and kept secure and where a third party processes your data on our behalf we will put in place appropriate safeguards as required under data protection laws.

## HOW LONG DO WE KEEP PERSONAL INFORMATION?

The duration for which we retain your personal information will differ depending on the type of information and the reason why we collected it. 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.

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, for example if you change your phone number or email address. You may be able to update some of the personal information we hold about you through our website. Alternatively, you can contact us by using the details set out in the 'Contacting Us' section below.

## YOUR RIGHTS IN RELATION TO PERSONAL INFORMATION

You have the following rights:

- 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.

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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.

If you are unhappy with the way we are using your personal information you can complain to the UK Information Commissioner's Office or your local data protection regulator.

<https://ico.org.uk/concerns/>

Tel: **0303 123 1113**.

## **Information Commissioner's Office**

**Wycliffe House**

**Water Lane**

**Wilmslow**

**Cheshire SK9 5AF**

We (The Halifax, Huddersfield and District Union of Golf Clubs) are here to help and would encourage you to contact us to resolve your complaint in the first instance.

## 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 and date at the bottom of this document. 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.

## CONTACTING US

In the event of any query or complaint in connection with the information we hold about you, please email or write to the Data Controller at:

HHDUGC  
c/o Halifax West End Golf Club  
Paddock Lane  
Halifax  
HX2 0NT

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## DOCUMENT CONTROL

### Key Information

<b>Title</b>	<b>Privacy Policy</b>
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### Version Control

<b>Version</b>	<b>Date</b>	<b>Summary of Changes</b>	<b>Author</b>
0.1	29/09/2020	Draft	Craig McMinn
1.0	17/01/2021	Approved version for Publishing	Craig McMinn