



## **OAKLEAF GOLF CLUB**

### **DATA PROTECTION POLICY**

This policy applies to:

Oakleaf Golf Club

School Aycliffe Lane

Newton Aycliffe

DL5 6QZ

Including: All staff operating on behalf of Oakleaf Golf Club and it applies to both paid staff and volunteers.

Policy operational date: January 2024

Policy prepared by: Paul Campbell (Secretary)

Welfare Officer – Andreas Russ

### **Introduction**

This policy sets out how we use and protect any personal information that has been given to Oakleaf Golf Club by its members, visitors or members of staff. This information may have been obtained via completion of paper application forms or by electronic data collection from the club's website.

We are committed to ensuring that personal privacy is protected. Any information by which a person can be identified will only be used in accordance with this privacy statement.

Oakleaf Golf Club will manage personal data sensitively and will treat all personal information as confidential and are fully compliant with General Data Protection Regulations (GDPR) which came into force on January 2024.

### **The purpose of this policy is to enable Oakleaf Golf Club to:**

- Comply with the law in respect of the data it holds about individuals
- Follow good practice with regard to data collection and storage
- Protect Oakleaf Golf Club members, staff and other individuals
- Protect Oakleaf Golf Club from the consequences of a breach of its responsibilities



**The General Data Protection Principles require that personal information is:**

- Processed fairly and lawfully
- Processed for limited purposes
- Adequate, relevant and not excessive
- Accurate and up to date
- Not kept for longer than is necessary
- Processed in line with the rights of individuals
- Data to be held using secure systems and control

**Oakleaf Golf Club has identified the following potential key risks which this policy is designed to address:**

- Breach of confidentiality (information being given out inappropriately)
- Insufficient clarity about the range of uses to which data will be put
- Not obtaining consent to use personal data • Breach of security by allowing unauthorised access
- Failure to establish efficient systems of managing changes leading to personal data not being up to date
- Harm to individuals if personal data is not up to date
- Insufficient clarity about the way staff or volunteers' personal data is being used e.g. given out to general public

**We may collect the following information:**

- Name and surname • Home postal address
- Email address
- Telephone Number
- Gender
- Handicap ability
- Member or non-member
- If some limited circumstance medical information relating to the need to use "ride-on buggies"

**What we do with the information we gather**



We require this for the following reasons:

- Internal record keeping
- Provision of membership card giving building access and the ability to load money onto the card and spend within the golf club
- Control of members handicaps
- We may periodically send promotional emails about special offers, competitions, results, functions or other information as appropriate relating to Oakleaf Golf Club activities, this will use the email address which has been provided
- Send notifications of AGM or EGM to be held, this will be via post or email.

## **SECURITY**

We are committed to ensuring that all personal information collected is saved in a secure manner. In order to prevent unauthorised access or disclosure, suitable physical, electronic and managerial procedures to safeguard and secure the information have been put in place

We do not transfer personal information to international third parties

We maintain adequate technical and organisational security measures to protect personal information from loss, misuse, unauthorised access, disclosure, alteration, or destruction

Any data transferred or shared will be via encrypted files with secure passwords

Data on any individual will be held in as few places as necessary, and all staff will be discouraged from establishing unnecessary additional data sets

In the event of a security breach Oakleaf Golf Club will notify the ICO without undue delay and, where feasible, within 72 hours of awareness (unless the breach is “unlikely to result in a risk to the rights and freedoms” of data subjects

## **Data recording and storage**

Oakleaf Golf Club will regularly review its procedures for ensuring that its records remain accurate and consistent and, in particular:

### **Retention of data:**

We will only keep personal information for as long as necessary for the purposes for which it was collected, to provide you with services and to conduct our legitimate business interests or where otherwise required by law

Members who leave the club will have all personal data relating to them removed after 1 year, the club will retain basic information such as name and handicap data (CDH number) for up to 6 years to facilitate the member wishing to re-join the club again at a later date



- IT systems will be designed, where possible, to encourage and facilitate the entry of accurate data.
- Effective procedures will be in place so that all relevant systems are updated when information about any individual changes
- Member's data held on the website will require the permission of the member before the data becomes accessible to other members. Permissions will be obtained by way of updating "profile data" and making it viable or private. These permissions may be withdrawn at any time by the member Archived paper records of members are stored in locked cabinets in the secretary's office

### **CCTV**

Oakleaf Golf Club has:

- Installed a CCTV system which produces clear images which the law enforcement bodies can use to investigate crime and these images can easily be taken from the system when required
- Monitors are sited in a position that provides the staff with easy access to view images.
- Placed visible signs showing that CCTV is in operation
- A limited number of authorised persons that may access the recorded images from the CCTV system, which are securely stored. The recorded images are held for 28 days and with the exception of law enforcement bodies, images will not be provided to third parties

### **Photography**

On occasions photographs are taken at golf club functions such as Prize Presentations, Dinners and Charity events, at all these an announcement will be made informing those present that photographs may be taken and if anyone wishes not to be photographed they will be given the opportunity to decline, this will be made especially clear when photographs include children. Photographs will be used for club newsletters, website and on the club's social media sites. The image of any person will not be shown in any way to the detriment of the person. Should anyone subsequently wish to have the photographs removed or taken down this will be acted on in a timely manner following the request

### **Policy and Data Review**

This policy will be reviewed as required due to legislation.

### **Changes to the Policy**

We reserve the right, to modify, add or remove sections of this privacy policy at any time due to changes in the law or to suit changes in the working practices of Oakleaf Golf Club. If these changes have material impact on anyone whose data is held they will be notified using the contact details held



## **Privacy Queries**

Any questions regarding this policy will be acted on in a timely manner following the request. This will typically be within one week.

- What are an individual's rights in relation to GDPR?
- The right to be informed – about what data you hold and how it is used
- The right of access – to request a copy of all information held about themselves
- The right to have mistakes corrected
- The right to have information deleted
- The right to restrict processing – to opt out of marketing etc

## **Access and Correction Rights**

Individuals can request access to, and have the opportunity to update and amend any personal information held by Oakleaf Golf Club, and can exercise any other rights under applicable data protection laws, including, for example, objection to and blocking of the processing of your personal information, The right for individuals to access their personal data through a "Subject Access Request" by contacting us – For security reasons, we reserve the right to take steps to authenticate the identity of the individual before providing access to their personal information. Personal data will be provided without charge and within a time frame of one month.

Further information can be obtained from the Information Commissioners Office at the ICO web site