

Heaton Moor Golf Club Ltd Privacy Policy

Heaton Moor Golf Club Ltd is committed to protecting the rights and freedoms of data subjects and safely and securely processing their data in accordance with all of our legal obligations.

We hold data about our members, employees, visitors and suppliers for a variety of business reasons.

This policy sets out how we seek to protect personal data and ensure that our Directors, Secretary and Administrators understand the rules governing their use of the personal data to which they have access to.

The Chairman will be the data protection officer[DPO} who is responsible for overseeing data protection strategy and implementation to ensure compliance with GDPR requirements

Heaton Moor Golf Club Ltd shall comply with the principles of data protection identified in the EU General Data Protection Regulations. We will make every effort possible in everything we do to comply with these principles. These principles are:

1. **Lawful, fair and transparent** – Only essential data will be collected and members and staff will be informed how it is to be used. This will include members names, address, telephone numbers, email address, age, gender, handicap, purchase history and date of joining. For staff we keep information that allows us to fulfil our legal obligations.
2. **Limited for purpose** –This data will only be used to fulfil our contractual obligations which includes being able to contact you to send you subscription renewal notices, newsletters, AGM notices, surveys and to administer competitions at the Club. We may share your information with external and internal data processors such as Club V1 and England Golf for handicapping purposes and BRS to allow on line booking of tee times. You may have opted in for us to be able to correspond with you regarding our activities including social events and competitions by way of post, telephone, email and SMS. If you do not 'opt in' we will not share your data with any external marketing agency and if you have consented you can opt out at any time. We will ask permission from

visitors and visiting societies to hold their personal data to fulfil our contractual obligations and inform them of future events.

3. **Data minimisation** – only data necessary for us to fulfil our contractual obligations will be collected
4. **Accurate** – We want to make sure the information we hold about you is accurate and up to date, you may ask us to correct or erase information you think is inaccurate. At the time of collecting data you have the right to object to the Club holding certain information about you.
5. **Retention**- We will not hold data we no longer have a legal basis for keeping. We may have asked for permission to retain your data for certain purposes, you can opt out of this at any time.
6. **Integrity and confidentiality**- The data we keep will be kept safe and secure

Please note that you have the right to request a copy of the information we hold about you. If you would like a copy of this information please email us on info@heatonmoorgolfclub.co.uk. This will be provided to you in a portable, machine readable commonly used format or if you prefer by mail. No charge will be made for these requests and a response will take no longer than 30 days.

We keep our privacy policy under regular review and will place any updates on our website.

This policy was last updated May 2018

If you need any further information please email us on info@heatonmoorgolfclub.co.uk. Heaton Moor Golf Club Ltd, Mauldeth Road, Heaton Mersey, Stockport SK4 3NX

Heaton Moor Golf Club Ltd Internal Procedures for Handling, Storing and Processing data

1. Procedures for Data Protection Officer (DPO) (Chairman)

- Ensure the Directors and employees understand compliance requirements through board and staff meetings
- Arrange staff training in data processing where necessary
- Conduct audits to ensure compliance and address potential issues
- Maintain records of data processing activities
- Inform members and staff how their data is used and their rights through newsletters, the club's website and staff meetings.
- The DPO will conduct a Privacy Impact Assessment annually
- Any data breaches that are likely to cause emotional distress, and physical or material damage will be reported to the Information Commissioner's Office [ICO]

2.Procedures for Data Processors (DP) (Club Secretary)

- Details from members application forms are kept on our membership database. The forms are kept in a locked cabinet in the office which is also kept locked out of hours.
- When a member leaves or dies their data will be removed immediately. Employees bank and next of kin personal data will be removed immediately they leave , records of Personal Protective Equipment will be kept for 3 years and contacts and financial records will be kept for 7 years.
- All databases are password protected.

2. Safe Storage of Data Procedures

- Access from off site is restricted to the Club Secretary and is password protected. Directors and officers of the club will only have access to data relevant to their position.
- Access to passwords is restricted to relevant users.
- Passwords are stored in a protected area on the office computer and backed up on i cloud.
- All data is backed up daily on i cloud and a mirror image of the office computer is taken quarterly and stored off site.

- Automatic timed log outs are installed on the office computers.
- Microsoft Security Essentials virus protection is installed on all office computers.
- A cross cut shredder is used for the disposal of paper documents. An annual secure shredding service is used for the disposal of historical documents

3. Data Breach procedures

- Security systems – Malware Bytes is run every week
- Administrator to be vigilant of suspicious activity such as unusually slow internet or devices, locked out accounts, unexpected software, suspicious out of hours activity, multiple failed log ins, irregular access locations.
- If a breach is suspected the Secretary or Administrator will immediately phone the DPO.
- If there is a serious breach that needs reporting the DPO will contact the ICO within 24 hours.

4. Subject Access Request Procedures

- SAR's will be dealt with immediately by the DPO and club secretary. A response will be made within 30 days.
- Checks will be made to confirm the individual's identity prior to giving access to information.
- Information will only be withheld if disclosing it would adversely affect the 'rights and freedoms of others'. Advice can be sought from NGCAA.
- A response will be available in an electronic format or hard copy,

5. Data Protection Policies

- These policies and procedures should be reviewed annually in March.
- The reviewed policy and procedure should be agreed by the directors at the first Board after the AGM which will ensure new officers of the club are aware of their responsibilities.
- These policy and procedures will be made available on the members area of the club website.

6. Privacy Impact Assessment

- A PIA will be conducted by the DPO and secretary if there is a change in data processors, new technology or external partners.
- The PIA will look at changes to risks to individuals or the organisation.