

# Mapperley Golf Club: Data Protection Policy

## 1. Scope of the policy

This policy applies to Mapperley Golf Club (MGC).

The policy sets out the requirements that the MGC Board of Directors (The Board) has put in place for processing information for membership & employment purposes, for visitor green fees and for the purchase of goods and services from external suppliers.

The policy details how personal information will be gathered, stored and managed in line with data protection principles and the General Data Protection Regulation (GDPR). The policy is reviewed on an ongoing basis by The Board to ensure that the MGC is compliant. This policy should be read in tandem with the **MGC Privacy Policy**.

## 2. Why this policy exists

This data protection policy ensures that MGC:

- Complies with data protection law and follows good practice.
- Protects the rights of members, employees, customers and suppliers.
- Is open about how it stores and processes members' data.
- Protects itself from the risks of a data breach.

## 3. General guidelines for Board members, Employees and Volunteers

- The only people able to access data covered by this policy should be those who need to communicate with or provide a service to the members, employees & visitors of MGC.
- MGC will provide induction training to Board members, employees and volunteers to help them understand their responsibilities when handling personal data.
- Board members, employees and volunteers should keep all data secure, by taking sensible precautions and following the guidelines below.
- Strong passwords must be used and they should never be shared.
- Personal data should not be shared outside of MGC unless with prior consent and/or for specific and agreed reasons.
- Member information should be reviewed and refreshed periodically or when policy is changed.

*Note: the term 'Volunteer' refers to any person, excluding employees and elected Board members of MGC, that voluntarily helps with the running of MGC.*

## 4. Data protection principles

The GDPR identifies 8 data protection principles.

**Principle 1** - Personal data shall be processed lawfully, fairly and in a transparent manner

**Principle 2** - Personal data can only be collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes.

**Principle 3** - The collection of personal data must be adequate, relevant and limited to what is necessary compared to the purpose(s) data is collected for.

**Principle 4** – Personal data held should be accurate and, where necessary, kept up to date. Every reasonable step must be taken to ensure that personal data that are inaccurate are erased or rectified without delay.

**Principle 5** – Personal data which is kept in a form which permits identification of individuals shall not be kept for longer than is necessary.

**Principle 6** - Personal data must be processed in accordance with the individuals' rights.

**Principle 7** - Personal data must be processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.

**Principle 8** - Personal data cannot be transferred to a country or territory outside the European Union unless that country or territory ensures an adequate level of protection for the rights and freedoms of individuals in relation to the processing of personal data.

#### **4.1. Lawful, fair and transparent data processing**

MGC requests personal information from members, visitors, employees and suppliers for the purpose of administering their involvement with MGC. The forms used to request personal information will contain a privacy statement informing members and visitors as to why the information is being requested and what the information will be used for.

Members and visitors will be asked to provide consent for us send 'marketing' communications about news, offers and events at MGC and a record of this consent will be securely held alongside their contact information. Members and visitors will be informed that they can, at any time, remove their consent and will be informed as to how to do so.

#### **4.2. Processed for Specified, Explicit and Legitimate Purposes**

Members, visitors, employees and suppliers will be informed as to how their information will be used and The Board will seek to ensure that personal information is not used inappropriately. Appropriate use of information provided will include:

- Communicating with members about their membership and/or renewal of their membership.
- Communicating with members about specific issues that may have arisen during the course of their membership.
- Communicating with members and visitors about MGC's competitions, activities and social events
- Sending members' information to *England Golf* for collection of County and National fees and administration of the Central Database of Handicaps (CDH).

MGC will ensure that Board members, employees and volunteers are made aware of what would be considered appropriate and inappropriate communication. Inappropriate communication would include sending marketing and/or promotional materials from external service providers.

MGC will ensure that personal information is managed in such a way as to not infringe an individuals' rights which include:

- The right to be informed
- The right of access
- The right to rectification
- The right to erasure
- The right to restrict processing
- The right to data portability
- The right to object

#### **4.3. Adequate, Relevant and Limited Data Processing**

##### **Members of MGC**

Members of MGC will only be asked to provide information that is relevant for membership purposes. This will include:

- Name, address, telephone number, email address
- Date of birth (for Playing members only, not Social Members)
- Gender
- Golf handicap
- Marketing preferences

Where additional information may be required, such as health-related information, this will be obtained with the specific consent of the member who will be informed as to why this information is required and the purpose that it will be used for.

Where MGC provides membership for children aged below 13, MGC will require consent from the identified parent or guardian. The consent will provide permission for the information to be held for the purpose of supporting and safeguarding the member in question.

### **Employees of MGC**

Employees will only be asked to provide information that is relevant for employment purposes. This will include:

- Name, address, telephone number, email address
- Date of birth and gender
- Bank account details and NI number.

### **Visitors to MGC**

Visitors will only be asked to provide information that is relevant for administering their booking. This will include name and contact details.

### **Suppliers to MGC**

Suppliers will only be asked to provide information that is relevant for placing orders and paying for goods and services. This will include name, contact details and bank account details.

## **4.4. Accuracy of Data and Keeping Data up to Date**

MGC has a responsibility to ensure individuals' personal information is kept up to date. Members will be informed to let the Membership team know if any of their personal information changes.

## **4.5. Accountability and Governance**

The Board is responsible for ensuring that MGC remains compliant with data protection requirements and can evidence that it has. The Board shall ensure that new members of the Board, employees and volunteers receive an induction into how data protection is managed within MGC and the reasons for this. The Board will review data protection and who has access to information on a regular basis as well as reviewing what data is held.

## **4.6. Secure Processing**

The Board has a responsibility to ensure that data is both securely held and processed. This will include:

- Board members, employees and volunteers using strong passwords.
- Board members, employees and volunteers not sharing passwords.
- Restricting access of sharing member information to those who need it on a regular basis.

MGC has contracted for services from with the following 3rd party data processors:

- Club Systems International
- BRS Golf
- HowDidiDo
- Payrollservice.com
- BlueSky Pensions

The Board has scrutinised the Terms and Conditions of each supplier and judge that they are GDPR compliant.

## **4.7. Subject Access Request**

Members, visitors, employees and suppliers are entitled to request access to the information that is held by MGC. The request needs to be received in the form of a written request to the Secretary of MGC. On receipt of the request, the request will be formally acknowledged and dealt with within 14 days unless there are exceptional circumstances as to why the request cannot be granted. MGC will provide a written response detailing all information held on the individual. A record shall be kept of the date of the request and the date of the response.

## **4.8. Data Breach Notification**

Were a data breach to occur action shall be taken to minimise the harm by ensuring all relevant persons are aware that a breach had taken place and how the breach had occurred. The Board shall then seek to rectify the cause of the breach as soon as possible to prevent any further breaches. Where necessary, the Information Commissioner's Office would be notified. The Board shall also contact the relevant individuals to inform them of the data breach and actions taken to resolve the breach.

If an individual contacts MGC to say that they feel that there has been a breach by MGC, a Board member will ask the member to provide an outline of their concerns. If the initial contact is by telephone, the Board member will ask MGC member to follow this up with an email or a letter detailing their concern. The concern will then be investigated by members of the Board who are not in any way implicated in the breach. Breach matters will be subject to a full investigation, records will be kept and all those involved notified of the outcome.

## **5. Contact**

If you have any questions about this policy, or have any complaints about our privacy practices, please contact us:

Email: [secretary@mapperleygolfclub.org](mailto:secretary@mapperleygolfclub.org)

Telephone: 0115 955 6672