

# North Oxford Golf Club Privacy Policy

This privacy policy explains:

- What personal data or information North Oxford Golf Club (“we”) collect from you and from people who have contact with us
- How we use that data and information.

## Who are we?

North Oxford Golf Club Ltd is a registered company, IP30376R, and our registered office address is Banbury Road, Oxford, OX2 8EZ. For the purposes of Data Protection, North Oxford Golf Club, is a registered data controller, ICO registration number Z8578869.

## What personal data or information do we collect?

The personal information we collect may include your name, address, email address, IP address (the internet address of the device you contacted us with) and information regarding what and when you access on our website and in our other electronic communications.

## How do we collect data or information from you? When you ...

- Make an enquiry via our website or via the telephone
- Use our website
- Submit an application for membership
- Enquire about organising or attending a Golf Society Day
- Take part in an open competition
- Choose to receive news and updates on upcoming competitions
- Enquire about a job opportunity
- Work for or with the golf club
- Exchange business cards with a member of the golf club

## How is your information used?

We collect your personal data or information to operate our golf club effectively and efficiently, and to provide you with the best information on our products and services.

We may use your information to:

- Administer your golf club membership.
- Answer enquiries that you make prior to any agreement or contract.
- Keep you informed about our services, our insights into golfing trends and best practice, our invites to events if you have opted-in to receive these communications.
- Invite you to open competitions.
- Notify you of competition results.
- Process payment(s) for green fee visitors.
- Process a job application.
- Fulfil our obligations as an employer.
- Provide benefits to you as an employee.
- Maintain security of our office and IT infrastructure.
- Invoice you, and to track payments you make to us or we make to you.

We believe that all these purposes are justified on the basis of our legitimate interests in running and promoting the golf club, our contractual requirements to deliver the agreed membership services to you, and our legal obligations, both as a golf club and as a responsible employer. If you would like to know more, please read below:

- Members
- Prospective Members
- Job Applicants, Our Current and Former Employees
- Business Partners (e.g. professional golfer)
- Suppliers
- Open Competition Entrants
- Green fee visitors and Society visitor groups

### Details of our processing

	Type of Data Held	Length of Time Held	How Data is Held
Members	<ul style="list-style-type: none"> <li>• Name and contact information.</li> <li>• Emergency contact details.</li> <li>• Information and documents relating to the membership we are providing, including communications with you.</li> <li>• Billing and payment information.</li> <li>• Member's handicap</li> <li>• Under 18's medical conditions requiring treatment.</li> </ul>	<p>We will retain information about you for the duration of your membership relationship with us, then for an additional 6 years.</p> <p>We retain financial records for 6 years, following the end of the current financial year.</p> <p>Handicap details are retained indefinitely</p>	<p>Data is stored in ClubV1 which is hosted in secure servers within the European Economic Area (EEA). <a href="http://www.brsgolf.com">www.brsgolf.com</a></p> <p>Handicap details are shared with howdidido. <a href="http://www.howdidido.com">www.howdidido.com</a></p>
Prospective Members	<ul style="list-style-type: none"> <li>• Name and contact information</li> <li>• Information and documents relating to the services we are providing, including communications with you.</li> </ul>	<p>We will retain information about you for the duration of the enquiry, then a further two years.</p>	<p>Data is stored in ClubV1 which is hosted in secure servers within the EEA.</p> <p><a href="http://www.brsgolf.com">www.brsgolf.com</a></p>
Job Applicants	<ul style="list-style-type: none"> <li>• Name and contact information</li> <li>• CV and application form.</li> </ul>	<p>We will retain information about you for the duration of the recruitment campaign, then one year.</p>	<p>Paper-based data is stored in manual records in locked filing cabinets and computer held records are password controlled.</p> <p>Data is stored on secure servers within the EEA.</p> <p><a href="http://www.dropbox.com">www.dropbox.com</a></p>
Current and Former Employees	<ul style="list-style-type: none"> <li>• Name, date of birth, and contact information</li> </ul>	<p>We will retain information about you for the duration</p>	<p>Paper-based data is stored in manual records in locked filing</p>

	<ul style="list-style-type: none"> <li>• National insurance number and Unique Tax Reference (UTR)</li> <li>• Information relating to your qualifications and experience</li> <li>• Information relating to performance reviews.</li> </ul>	of our contractual relationship with you, then for an additional 6 years.	<p>cabinets and computer held records are password controlled.</p> <p>Data is stored on secure servers within the EEA.</p> <p><a href="http://www.dropbox.com">www.dropbox.com</a></p>
Suppliers	<ul style="list-style-type: none"> <li>• Contact details</li> <li>• Bank details</li> <li>• Description of the services bought</li> </ul>	We retain financial records for 6 years, following the end of the current financial year.	<p>Data is stored on secure EEA-based servers.</p> <p><a href="http://www.dropbox.com">www.dropbox.com</a></p>
Open Competition Entrants	<ul style="list-style-type: none"> <li>• Contact Details</li> <li>• Dates of previous visits</li> </ul>	We retain open competition details are retained indefinitely	<p>Data is stored in ClubV1 which is hosted in secure servers within the EEA.</p> <p><a href="http://www.brsgolf.com">www.brsgolf.com</a></p>
Green Fee Visitors and Society Group Organisers	<ul style="list-style-type: none"> <li>• Contact Details</li> <li>• Dates of previous visits</li> <li>• Payment details</li> </ul>	<p>We retain information about you for one year after your last visit.</p> <p>We retain financial records for 6 years, following the end of the current financial year.</p>	<p>Data is stored in manual records in locked filing cabinets.</p> <p>Data is stored on secure servers within the EEA.</p> <p><a href="http://www.brsgolf.com">www.brsgolf.com</a></p>

### Electronic communications to members

We use a third-party provider, Cairn Agency ([www.cairnagency.co.uk](http://www.cairnagency.co.uk)) to deliver via Mailchimp ([www.mailchimp.com](http://www.mailchimp.com)) our members' newsletters, competition invitations and other information. We gather statistics around email opening and clicks using industry standard technologies including clear gifs to help us monitor and improve our electronic communications. As a member you can manage what electronic communications you receive from the club and can unsubscribe at any time.

### Emailing us

We use Transport Layer Security (TLS) to encrypt and protect email traffic in line with UK government standards. If your email service does not support TLS, you should be aware that any emails we send or receive may not be protected in transit.

We will also monitor any emails sent to us, including file attachments, for viruses or malicious software. Please be aware that you have a responsibility to ensure that any email you send is within the bounds of the law. We use and store emails using google's G Suite.

[https://privacy.google.com/businesses/compliance/#?modal\\_active=none](https://privacy.google.com/businesses/compliance/#?modal_active=none)

## **Who has access to your information?**

We do not sell or rent your personal data or information to any third party or share your information with third parties for their marketing purposes.

We will disclose your data or information if required by law, for example by a court order or for the prevention of fraud or other crime.

We may pass your information on to our third-party service providers, agents or subcontractors (e.g. Club Systems) for the purposes of completing a task or providing services to you on our behalf (for example to manage your subscriptions). However, we disclose only the personal information necessary to deliver that service and have a contract in place that requires them to keep your information secure and not to use it for their own marketing purposes.

Third party services providers who act as data processors on our behalf:

- Amber Financial Management Limited ([www.amberwealth.co.uk](http://www.amberwealth.co.uk)) provide payroll and accounting services to us. They cannot use the data we hold for their own purposes.
- BRS Golf provide ClubV1 ([www.brsgolf.com](http://www.brsgolf.com)) and at times may be required to access our systems for maintenance, upgrade and support services.

## **Transfers outside of the European Economic Area**

Your personal information in the European Economic Area (EEA) is protected by data protection laws, but other countries do not necessarily protect your personal information in the same way. The EEA covers all countries in the EU plus Norway, Liechtenstein and Iceland. We use online tools that host data outside of the EEA. Prior to selecting such tools, we review their privacy policy and check that the company is signed up to the EU-US Privacy Shield agreement. Companies who have signed up to this agreement commit to securing personal data in line with EU data protection legislation.

## **Keeping your data secure**

When you give us personal information we take steps to ensure that it's treated securely and we strive to protect it on our internal systems.

## **Your rights**

You have certain rights over the processing of your personal information by us. These are:

- The right to be informed, which is what this privacy policy is for
- The right to access the data we hold about you
- The right to object to direct marketing
- The right to object to processing carried out on the basis of legitimate interests
- The right to erasure (in some circumstances)
- The right to data portability
- The right to have your data rectified if it is inaccurate
- The right to have your data restricted or blocked from processing

## **How you can update your information**

The accuracy of your information is important to us. If you change your contact details or if you want to update any of the information we hold on you, please contact us by email [gm@northoxfordgolf.co.uk](mailto:gm@northoxfordgolf.co.uk) or by post at North Oxford Golf Club, Banbury Road, Oxford, OX2 8EZ. Alternatively, you can telephone us on 01865 554924 option 2.

**How you can access your personal information**

You have the right to ask for a copy of the personal information that we hold about you. To do this please contact us by email [gm@northoxfordgolf.co.uk](mailto:gm@northoxfordgolf.co.uk) or by post at North Oxford Golf Club, Banbury Road, Oxford OX2 8EZ. Alternatively, you can telephone us on 01865 554924 option 2.

You also have the right to lodge a complaint about our processing of your personal data with the UK's [Information Commissioner's Office](#).

**Changes to this privacy notice**

We keep our privacy notice under regular review. This privacy notice was last updated on 16<sup>th</sup> May 2018.

Philip Morley – General Manager and Data Protection Officer