



BRAMSHAW GOLF CLUB  
EST. 1880

## **Data Privacy Policy**

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### **1. About this Policy**

- 1.1 This policy explains when and why we collect personal information about our members, guests and volunteers, how we use it and how we keep it secure and your rights in relation to it.
- 1.2 We may collect, use and store your personal data, as described in this Data Privacy Policy and as described when we collect data from you.
- 1.3 We reserve the right to amend this Data Privacy Policy from time to time without prior notice. You are advised to check our website <http://www.bramshaw.co.uk/privacy> or our Club noticeboard regularly for any amendments (but amendments will not be made retrospectively).
- 1.4 We will always comply with the General Data Protection Regulation (**GDPR**) when dealing with your personal data. Further details on the GDPR can be found at the website for the Information Commissioner ([www.ico.gov.uk](http://www.ico.gov.uk)). For the purposes of the GDPR, we will be the “controller” of all personal data we hold about you.

### **2. Who are we?**

2.1 We are Bramshaw Golf Club and will be what’s known as the ‘Controller’ of the personal data that you provide to us. We can be contacted at:


Bramshaw Golf Club  
Brook  
New Forest  
SO43 7HE

Tel: 02380 813433

Email: [golf@bramshaw.co.uk](mailto:golf@bramshaw.co.uk)

### 3. What information we collect and why?

We seek to acquire information about you when you use our website. This includes; when you contact us through our website, when you purchase products and services from our website, or if you register to receive our newsletter service.

Whenever we request personal information from you on our website we will always aim to reasonably explain why we are collecting the information and refer you to this policy for more comprehensive detail. The points where we are requesting your personal information will be highlighted by the following symbol: 

Please note, we do not collect or store personal data about you supplied or obtained from any 3rd party sources. Any data we store is only that which we have collected from you directly.

#### 3.1 How information is collected from you?

##### Who this policy applies too:

This policy applies to both members, guests, visitors and website visitors. These terms have the following meanings;

- Members: anyone that receives our services, provided directly by us, and has the ability to log in to the Members area.
- Guests: any guest of the Club or member that receives our services, provided directly by us.
- Visitor: any visitor to the Club who receives our services, provided directly by us.
- Website visitors: anyone visiting our website.

#### 3.2 Membership Application Forms / Open Competition Entry Forms / Website Enquiry Submissions / Contact Forms

When you contact us about our products and services we will request personal details such as your name, telephone number, address, email address, age, gender but only if it is relevant to the service you are requesting. Details of the type of information we hold and why can be found in the table below.

Type of information	Purposes	Legal basis of processing
Name, address, telephone numbers, e-mail address(es), age, gender.	Managing the Member's membership of the Club.  Managing competitions entries.	Performing the Club's agreement with the Member.  For the purposes of our legitimate interests in operating the Club.
The names and ages of Juniors of the Club.	Managing the Junior Member's and their membership of the Club including competition entries.	Performing the Club's agreement with the Member.

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Emergency contact details	Contacting next of kin in the event of emergency.	Protecting the Member's vital interests and those of their dependants.
Date of birth / age related information	Managing membership categories which are age related	Performing the Club's agreement with the Member.
Gender	Provision of adequate facilities for members.	For the purposes of our legitimate interests in making sure that we can provide sufficient and suitable facilities (including changing rooms and toilets) for each gender.
Visitor's and guests name, address, telephone numbers, e-mail address(es).	Managing guest/visitor bookings, competition entries and competition results. Sharing competitions results with other clubs, regional organisations and governing bodies. Providing competition results to local and national media.	For the purposes of our legitimate interests in booking visitors, holding competitions for the benefit of members of the Club.  For the purposes of our legitimate interests in promoting the Club.  For the purposes of our legitimate interests in operating the Club
The Member's name and e-mail address, contact telephone number	Creating and managing the Club's online Membership Directory.	For the purposes of allowing members to arrange matches and games with other members of the golf club. The Member may withdraw their consent at any time by contacting us by e-mail or letter to tell us that they no longer wish their details to appear in the Membership Directory or making themselves ex-directory by going to <b>My Golf &gt;&gt; Preferences</b> when logged into the Club website.
Bank account details of the member or other person making payment to the Club via Premium Credit	Managing the Member's and their dependants' membership of the Club, the provision of membership payment services through Premium Credit.	Performing the Club's agreement with the Member.
Member's age and gender.	Passing information to governing bodies (e.g. England Golf) for the purposes of membership surveys. The surveys are for the benefit of the Club (and other clubs) and / or the benefit of England Golf.	For the purposes of our legitimate interests in operating the Club and / or the legitimate interests of England Golf in its capacity as the national body for golf.
Volunteer's name, address, email addresses, phone numbers and relevant	Managing instruction at the club.	For the purposes of our legitimate interests in ensuring that we can contact those offering instruction and provide

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qualifications and/or experience.		details of volunteers to members.
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### 4. How we protect your personal data

4.1 We will not transfer your personal data outside the EU without your consent.

4.2 We have implemented generally accepted standards of technology and operational security in order to protect personal data from loss, misuse, or unauthorised alteration or destruction.

4.3 Please note however that where you are transmitting information to us over the internet/email this can never be guaranteed to be 100% secure.

4.4 For any payments which we take from you online we will use a recognised online secure payment system (Sage Pay). Sage Pay has its own privacy policy which can be viewed [HERE](#)

4.5 We will notify you promptly in the event of any breach of your personal data which might expose you to serious risk.

### 5. Who else has access to the information you provide us?

5.1 We will never sell your personal data. We will not share your personal data with any third parties without your prior consent (which you are free to withhold) except where required to do so by law or as set out in the table above or paragraph 5.2 below.

5.2 We will share limited membership data with specific third parties who adhere to the principles and rules of GDPR. These are Intelligent Golf (for the purposes of the Club website), Foremost Golf (for the purpose of advising the membership as to our golf professional's services), and England Golf (for the administering your handicap under the World Handicap System). We only disclose only the personal data that is necessary for these third parties to deliver their services to you, the member.

### 6. How long do we keep your information?

6.1 We will not store your personal information for any longer than we need to, however we will hold your personal data on our systems for as long as you are a member of the Club and for as long afterwards as is necessary to comply with our legal obligations. We will review your personal data every year to establish whether we are still entitled to process it. If we decide that we are not entitled to do so, we will stop processing your personal data except that we will retain your personal data in an archived form in order to be able to comply with future legal obligations e.g. compliance with tax requirements and exemptions, and the establishment exercise or defence of legal claims.

6.2 As a guest or visitor, if you purchase any products and services from us (e.g. green fees), then under UK tax law we are required to keep your basic personal data (name, address, contact details) for a minimum of 6 years after which time it can be erased on your request.

6.2 We securely destroy all financial information once we have used it and no longer need it or until you notify us that you no longer wish us to do so, unless your request contradicts our statutory obligations.

### **7. Website Use**

#### **7.1 Google Analytics**

When someone visits our website we use a third party service, Google Analytics, to collect standard internet log information and details of visitor behaviour patterns. We do this to find out things such as the number of visitors to the various parts of the site. This information is only processed in a way which does not identify anyone. We do not make, and do not allow Google to make, any attempt to find out the identities of those visiting our website. If we do want to collect personally identifiable information through our website, we will be up front about this. We will make it clear when we collect personal information and will explain what we intend to do with it.

#### **7.2 Use of 'cookies'**

Please be aware that our website uses cookies. If you haven't heard of 'Cookies' before, they are small pieces of information sent by a website and stored on your hard drive. Our website uses 'Cookies' to collect statistical data about your browsing actions and preferences. For example cookies may be used to store your language preference on our website. Please be aware that our 'Cookies' do not identify you as an individual, until you have contacted us through our website.

It is possible to configure or completely switch off 'Cookies' by changing your browser preferences.

### **8. CCTV**

Bramshaw GC uses closed circuit television (CCTV) images to provide a safe and secure environment for members, employees and for visitors to the business premises. The Club's CCTV facility records images and audio.

#### **8.1 Purposes of CCTV**

The purposes of the Club installing and using CCTV systems include:

- To assist in the prevention or detection of crime or equivalent malpractice.
- To assist in the identification and prosecution of offenders.
- To monitor the security of the Club's business premises.
- To ensure that health and safety rules and Club procedures are being complied with.

#### **8.2 Location of cameras**

No camera focuses, or will focus, on toilets, shower facilities, changing rooms, staff kitchen areas, staff break rooms or private offices. Appropriate signs are prominently displayed so that members, employees and visitors are aware they are entering an area covered by CCTV.

#### **8.3 Recording and retention of images**

Images may be recorded either in constant real-time (24 hours a day throughout the year), or only at certain times, as the needs of the business dictate.

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As the recording system records digital images, any CCTV images that are held on the hard drive of a PC or server are deleted and overwritten on a recycling basis and, in any event, are not held for more than one month. Once a hard drive has reached the end of its use, it will be erased prior to disposal.

Images that are stored on, or transferred on to, removable media such as CDs are erased or destroyed once the purpose of the recording is no longer relevant. In normal circumstances, this will be a period of one month. However, where a law enforcement agency is investigating a crime, images may need to be retained for a longer period.

### **8.4 Access to and disclosure of images**

Access to, and disclosure of, images recorded on CCTV is restricted. This ensures that the rights of individuals are retained. Images can only be disclosed in accordance with the purposes for which they were originally collected.

The images that are filmed are recorded centrally and held in a secure location. Access to recorded images is restricted to the operators of the CCTV system and to those line managers who are authorised to view them in accordance with the purposes of the system. Viewing of recorded images will take place in a restricted area to which other employees will not have access when viewing is occurring. If media on which images are recorded are removed for viewing purposes, this will be documented.

Disclosure of images to other third parties will only be made in accordance with the purposes for which the system is used and will be limited to:

- The police and other law enforcement agencies, where the images recorded could assist in the prevention or detection of a crime or the identification and prosecution of an offender or the identification of a victim or witness.
- Prosecution agencies, such as the Crown Prosecution Service.
- Relevant legal representatives.
- Individuals whose images have been recorded and retained (unless disclosure would prejudice the prevention or detection of crime or the apprehension or prosecution of offenders).

## **9. Your rights**

9.1 You have rights under the GDPR:

- (a) to access your personal data
- (b) to be provided with information about how your personal data is processed
- (c) to have your personal data corrected
- (d) to have your personal data erased in certain circumstances
- (e) to object to or restrict how your personal data is processed
- (f) to have your personal data transferred to yourself or to another business in certain circumstances.

### **9.2 Erasure of data**

You have a right to have your personal data erased to prevent processing in the following specific circumstances:

- Where the personal data is no longer necessary in relation to the purposes for which it was originally collected/processed.
- If you wish to withdraw consent.

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- If you object to the processing and there is no overriding legitimate interest for continuing the processing.
- The data was unlawfully processed in accordance with the GDPR.
- The personal data has to be erased in order to comply with a legal obligation.
- The personal data is processed in relation to the offer of information society services to a child.

### 9.3 Keeping your information secure

To help keep your information confidential you should:

- Keep your password secret.
- Never distribute the website addresses for pages that you have looked at while logged in as a registered member or visitor.
- Choose a password that is not obvious or known to anyone else.
- Never give a third party your password, as you will be responsible for all activity and charges incurred through use of your password whether authorised by you or not.

If you forget your password, you can request a new password, which will be emailed to the address we hold for you. You can change your password anytime through the MY GOLF facility on the website. Should we think that there is likely to be, or has been any breach of security, we may change your password and notify you of the change by email.

9.4 You have the right to take any complaints about how we process your personal data to the Information Commissioner: <https://ico.org.uk/concerns/>

0303 123 1113  
Information Commissioner's Office  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire SK9 5AF

For more details, please address any questions, comments and requests regarding our data processing practices to our Data Protection Manager ([ias@bramshaw.co.uk](mailto:ias@bramshaw.co.uk)).

### **Bramshaw Golf Club Privacy Responsibility Statement:**

This privacy policy sets out how Bramshaw Golf Club uses and protects any information that you give Bramshaw Golf Club when you:

- Join Bramshaw Golf Club as a member
- Enter an Open Competition at Bramshaw Golf Club
- Book a tee time online at [www.bramshaw.co.uk](http://www.bramshaw.co.uk)
- Complete and online or physical/paper application form

The privacy policy also sets out how Bramshaw Golf Club governs the manner in the Club collects, uses, maintains and discloses information collected from users (each, a “User”) of the [www.bramshaw.co.uk](http://www.bramshaw.co.uk) website (“Site”) and all product/service application forms offered by Bramshaw Golf Club.

Bramshaw Golf Club is committed to ensuring that your privacy is protected. Should we ask you to provide certain information by which you can be identified when using our services; you can be assured that it will only be used in accordance with this privacy statement.

Bramshaw Golf Club may change this policy from time to time by updating this page. You should check this page from time to time to ensure that you are happy with any changes. This policy is effective from **1<sup>st</sup> February, 2018.**

#### What we collect

We may collect the following information:

- Name
- Contact information including Email address and telephone number.
- Demographic information such as postcode, age and gender. This information may be passed on to EnglandGolf for their annual report/survey but any information that is passed on will not be identifiable to you.

#### What we do with the information we gather

We require this information to understand your needs and provide you with a better service, and in particular for the following reasons:

- Internal record keeping and membership services
- To administer competitions results and relevant services associated with competitions
- To improve our products and services
- To send informational Emails about new products, special offers or other services associated with Bramshaw Golf Club
- To conduct market research. For market research purposes we will only contact you by email. We may use the information to customise the website and our products according to your interests.

#### Security



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We are committed to ensuring that your information is secure. In order to prevent unauthorised access or disclosure, we have put in place suitable physical, electronic and managerial procedures to safeguard and secure the information we collect.

### Members Area (Website)

The members area of the website and membership data processing is provided by IntelligentGolf as the “processor” on behalf of Bramshaw Golf Club, the “controller”. Bramshaw Golf Club uses this website to provide online information and services, competition management, CONGU ratified handicap maintenance and email communications for members of the Club.

Access to this website is via a member's unique email address or Bramshaw Golf Club's Membership ID, and a User managed PIN number. This is limited to Club Members and selected Club staff who require access for the purpose of supplying and maintaining information relative to the primary functions of the members' website, as stated above.

Bramshaw Golf Club will transfer from its own membership system only those personal details relevant to Golf Club membership such that a Club member may utilise this website effectively.

Users of the website are able to specify additional personal details by accessing the 'Preferences' area under the 'My Golf' menu option. The details specified here will be used solely for the following purposes:-

- Communication between Members to facilitate the management of matches and competitions
- Communication between Members, Golf Club Committee Members and Bramshaw Golf Club staff to promote accessibility and enable the effective and smooth running of the club.
- Contact information may be passed to Bramshaw Golf Club to enable them to maintain up to date contact information on their systems.

Cookies are used throughout this website for tracking session data, and this data is automatically discarded after you leave the website. Persistent cookies may also be used to remember specific personal selection preferences.

### Links to other websites

Our website may contain links to other websites of interest. However, once you have used these links to leave our site, you should note that we do not have any control over that other website. Therefore, we cannot be responsible for the protection and privacy of any information which you provide whilst visiting such sites and such sites are not governed by this privacy statement. You should exercise caution and look at the privacy statement applicable to the website in question.

### Controlling your personal information

You may choose to restrict the collection or use of your personal information in the following ways:

- Whenever you are asked to fill in a form on the website, we will only use the information provided you have ticked the box and agreed for us to do so and also that you want to receive relevant information from Bramshaw Golf Club.
- If you have previously agreed to us using your personal information to send you information on any our services, you may change your mind at any time by writing to or emailing us at [golf@bramshaw.co.uk](mailto:golf@bramshaw.co.uk)

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We will not sell, distribute or lease your personal information to third parties unless we have your permission or are required by law to do so. We may use your personal information to send you promotional information about third parties which we think you may find interesting if you tell us that you wish this to happen.

You may request details of personal information which we hold about you under the Data Protection Act 1998. If you would like a copy of the information held on you please write to: Bramshaw Golf Club, Bramshaw, New Forest, Hampshire, SO43 7HE.

If you believe that any information we are holding on you is incorrect or incomplete, please write to or Email us as soon as possible, at the above address. We will promptly correct any information found to be incorrect.

We will only hold your personal information for the length of time stated on application forms. Once the outlined length of time has elapsed your personal information will be destroyed/deleted.