



# Data Privacy Policy for Thurles Golf Club

## Policy Statement

Thurles Golf Club has responsibility to maintain high standards of confidentiality for safeguarding information about its members, employees, suppliers, visitors and others with whom the Club communicates and interacts.

During the course of the Club's activities the Club may collect, store and process personal information and the Club recognises the need to treat this data in an appropriate and lawful manner. The Club is committed to complying with its obligations in respect of all personal data held.

The types of information the Club may be required to handle include details of current, past and prospective Members, Employees, Suppliers and Visitors and others with whom the Club communicates and interacts. The information, which may be held on paper, on computer or other media, is subject to certain legal safeguards specified in the relevant Data Protection Acts and other regulations. The Acts impose restrictions on how the Club may collect and process the data. This policy is required to be put in place by the Club by operation of law.

The Club is committed to complying at all times with the Data Protection Acts, and, without prejudice to the generality of the foregoing, the eight primary rules of Data Protection, the Guidelines issued by the Office of Data Protection including the Data Protection in the Charity and Voluntary Sector Guidelines, the Personal Data Security Breach Code of Practice as approved by the Data Protection Commissioner under Section 13 (2)(b) of the Data Protection Acts, 1988 and 2003, the published decisions of the Office of Data Protection in Ireland and other binding codes and decisions of the Office of Data Protection as well as the spirit and intent of the aforementioned Acts and Regulations.

## Purpose and Scope of the Policy

This policy sets out Club Rules on data protection and the legal conditions that must be satisfied in relation to the collecting, obtaining, handling, transportation, storage and destruction of personal and sensitive information.

When you join or visit Thurles Golf Club, we collect only the information required from you to be able to fulfil our contractual obligations.

When you join as a member or enter into a society event or open competition, we may share your information with external and internal data processors (Genesys Handicapping System, BRS, Golfnet).

We may correspond with you regarding our activities including events and competitions by way of post, telephone, email and text message. We don't share your data with external marketing companies who would contact you in this way. You can opt out from receiving correspondence at any time by notifying the Club Data Protection Officer.

If any Member or Employee considers that this policy has not been followed in respect of personal data about themselves or any third party, they have an obligation to raise it with the Data Protection Officers in writing setting out the breach alleged.

### **Data Protection Officer**

The Club Data Protection Officer is the person assigned by the Governing Body to supervise and administer all the Club's data controls. As this is a Club which is managed on a voluntary basis, involves a management structure that alters annually and is subject to significant turnover and as it is community based, particular and special care must and will be taken at all times to ensure, as hitherto, that the data is kept and maintained strictly confidential and secure.

Data will be accessible to and only be made available to those persons who necessarily and directly require access to same for the direct and immediate discharge of their duties and responsibilities and such persons are obliged to maintain strict confidentiality in relation to all personal data in keeping with the Data Protection Legislation. The Club shall take all necessary steps to ensure that, where this involves a large number of persons, such steps and actions as shall be necessary and appropriate, in prior consultation and with the agreement of, with the subjects of the said Personal Data, will be taken to secure such data whether by the creation and composition of such sub groups with whom the said Personal Data is to be shared or communicated to, or some other appropriate person who may, in the opinion of the subject of the Personal Data use the same to bully, harass or cause harm to said Data Subject(s).

It is a legal requirement for the Club to comply with the Data Protection Acts and/or any further amendments thereto. It is also Club policy to ensure that every Member and Employee maintains the confidentiality of any person data held by the Club in whatever way.

All enquires relating to the holding of personal data should be referred in writing to the Data Protection Officer in the first instance. The Data Protection Officer in Thurles Golf Club is Ashling Moroney.

## 1. What is a Privacy Policy and why is it important?

**1.1** This Policy explains when and why we collect personal information about our members, 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 the 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 [www.thurlesgolfclub.com](http://www.thurlesgolfclub.com) or our Club noticeboard regularly for any amendments.

**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 Data Protection Commissioner ([www.dataprotection.ie](http://www.dataprotection.ie) or [www.GDPRandYou.ie](http://www.GDPRandYou.ie)). 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 Thurles Golf Club. We can be contacted at Turtulla, Thurles, Co. Tipperary, E41 NX93/0504-21983/office@thurlesgolfclub.com

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

| Type of Information                                      | Purposes  | Legal Basis of processing   |
|--|---|---|
| Member's name, address, telephone numbers, email address | Managing the Member's membership of the Club  | Performing the Club's contract with the Member.<br><br>For the purpose of our legitimate interests in operating the Club.   |
| Date of birth/age related information                    | Managing membership categories which are age related  | Performing the Club's contract with the Member.   |
| Gender   | Provision of adequate facilities for Members<br><br>Reporting information to the GUI and ILGU | 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 |
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| <p>The Members name and handicap</p>                         | <p>Managing competition entries and results</p> <p>Sharing competition results with the GUI and ILGU</p>   | <p>For the purpose of our legitimate interests in holding competitions for the benefit of Members of the Club.</p> <p>For the purposes of our legitimate interests in promoting the Club.</p> <p>For the purpose of our legitimate interests in operating the Club</p>   |
| <p>The Members mobile number</p>                             | <p>Provide mobile number to other members only for the purposes of arranging matches, changing playing times etc.</p>  | <p>For the purpose of our legitimate interests in holding competitions for the benefit of Members of the Club.</p> <p>For the purpose of our legitimate interests in operating the Club</p>  |
| <p>Photos and videos of Members and their guests</p>         | <p>Putting on the Club's website and social media pages and using in Press Releases and local paper</p>  | <p>Consent. We will seek the members consent on each new membership application form.</p> <p>Any existing Member may withdraw their consent at any time by contacting us by email or letter.</p>   |
| <p>The Member's name, email address and telephone number</p> | <p>Creating and managing the Club's online Membership Directory and for keeping Members up-to-date on on-going/upcoming Club competitions, news etc. via email and text message.</p> | <p>Consent. We will seek the Members consent on each new membership application.</p> <p>Any existing Member may withdraw their consent at any time by contacting us by email or letter to tell us that they no longer wish their details to appear in the Membership Directory and no longer wish to receive news and information from the Club via email or text message.</p> |
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|---|---|---|
| The Member's Bank Details   | Managing Members monthly payments – only applicable to those Members who have complete and signed a Direct Debit Mandate  | Performing the Club's contract with the Member.<br><br>For the purposes of our legitimate interests in operating the Club |
| Name, email address and telephone number of each Club Officer and Club Committee Member   | Information may be made available to other Club Members, Officers/Committee Members of other Golf Clubs from time to time where necessary and to the GUI and ILGU | For the purposes of our legitimate interests in operating and promoting the Club  |
| Employees of the Club's name, address, telephone numbers, PPS No and bank account details | Managing their employment at the Club   | For the purposes of our legitimate interests in operating the Club and the Club's relationship with our employees         |
| Representatives of suppliers to the Club  | Entering into and managing arrangements with suppliers  | Entering into and performing contracts with suppliers   |

#### **4. How we protect your personal data**

**4.1** We have implemented generally acceptable standards of technology and operational security in order to protect personal data from loss, misuse, or authorised alteration or destruction.

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

**4.3** For any payments that we take from you online or over the phone we will use an online secure payment system.

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

#### **Data Security**

The Club is responsible for ensuring complete and comprehensive compliance with the spirit and the letter of the relevant legislative provisions, Guidelines, Codes of Practice and directives from the Office of Data Protection.

Without prejudice to the generality of the foregoing, the Club is responsible for:

- a) Understanding that any breach of the Data Protection Policy, either deliberate or through negligence, may lead to a disciplinary action being taken and could in some case result in a criminal prosecution.
- b) Ensuring that any personal data that the Club holds, whether in electronic or paper format, is kept securely.
- c) Ensuring that Members, Employees, Contractors and Agents are familiar with and following the Data Protection Policy
- d) Personal information is not disclosed either verbally or in writing, accidentally or otherwise, to any unauthorised third party, save as agreed and permitted by law.
- e) The putting into place of appropriate procedures and security measures to ensure that all information originally furnished to the Club is used and disclosed only for that limited agreed purpose.
- f) Putting into place of appropriate procedures and security measures to ensure that all information obtained by one person or disclosed to one person for one specified purpose shall not be disclosed to, accessed by and/or used for, another purpose, entity or section within the Club. This will include but not necessarily be limited to providing secure data holding facilities, file tracking, audit trails, confidentiality agreements etc. to ensure that such unauthorised access, where it takes place, can be tracked and provide a basis for appropriate measures to be taken to deal with it both by the Club and the Office of Data Protection.
- g) If one section of the Club wishes to transfer personal data about its members/employees to another part of the same entity then, prior to doing so and to ensure that it is lawful and permissible, ensure that all of the relevant requirements for a transfer of personal data and information have been met and the consent of the Data Subjects obtained.
- h) Regular and on-going assessment of the risk and threats that exist to personal data held by the Club, consultation with the stakeholders within the Club in so far as the Data Protection Acts as amended are concerned.

### **Data Protection Principles**

The Club, within reason, needs to keep certain information about its Members, Employees, Visitors and Suppliers for financial and commercial reasons and to enable it to monitor performance, to ensure legal compliance and for health and safety purposes. To comply with the law, information must be collected and used fairly, stored safely and not disclosed to any other person unlawfully. This means that we must comply with the Data Protection Principles set out in the Data Protection Acts.

These principles require that Personal Data must be:

- i. Obtained fairly and lawfully and shall not be processed unless certain conditions are met.

- ii. All data will be stored in the office of the clubhouse and will not be removed from the clubhouse without the permission of the Data Protection Officer.
- iii. Obtained for specified and lawful purposes and not further processed in a manner incompatible with that purpose.
- iv. Adequate, relevant and not excessive.
- v. Accurate and up-to-date.
- vi. Kept for no longer than necessary.
- vii. Processed in accordance with data subject's rights.
- viii. Protected by appropriate security.
- ix. Not transferred to a country outside the European Union without adequate protection.

In processing or using any personal information the Club must ensure that it follows these principles at all times.

## **5. Who else has access to the information your 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 we are required to do so by law or as set out in the table above or in paragraph 5.2 below.

**5.2** We may pass your personal data to third parties who are service providers, agents and subcontractors to us for the purposes of completing tasks and providing services to you on our behalf (e.g. teetime reservations, to send you mailings or text messages). We do this for the purpose of our legitimate interests in operating the Club and fro performing our contract with you. However, we disclose only the personal data that is necessary for the third party to deliver the service and we have a contract in place that requires them to keep your information secure and not to use it for their own purposes. It is possible that third parties may themselves engage others (sub processors) to process your data. Where this is the case third parties will be required to have contractual arrangements with their sub-processor(s). that ensure your information is kept secure and not used for their own purposes.

### **GUI/ILGU**

The Club is affiliated with the Golfing Union of Ireland (GUI) and the Irish Ladies Golf Union (ILGU). The GUI and ILGU operate and maintain the details of the handicap of members on the [www.golfnet.ie](http://www.golfnet.ie) system and for this purpose allocated each individual member of the Club a unique personal identifier number. The system has been designed by GUI/ILGU to provide members of Clubs affiliated to GUI/ILGU, including Thurles Golf Club, with enhanced membership services free of charge.

The purposes for which GUI/ILGU may use the data are as follows:

1. GUI/ILGU may use your details to communicate directly with the people who play the sport in Ireland, to provide them with information and other benefits to their membership, and
2. The provision of a handicap system for all individual members of affiliated Clubs and the wider golf community through the introduction of the Club Membership Number.

Your handicap details are displayed in the Clubhouse in the locked cabinet in the hallway (men) and locker room (ladies) as per CONGU Rules.

Under the Data Protection Acts 1988 and 2003, as amended, you are entitled to write to the Golfing Union of Ireland or Irish Ladies Golf Union at their addresses to request a copy of your personal data which GUI/ILGU Golfnet holds. Similarly with BRS which operates the Clubs online booking system, you are entitled to write to them at their address to request a copy of your personal data. Should inaccuracies exist in your personal data held by GUI/ILGU or BRS, you are entitled to request that they amend or erase it.

Unless you specifically request the Club Data Protection Officer to do otherwise, the Club Office will provide your telephone number to other members only for the purposes of arranging matches, changing playing times etc. Your address will not be provided directly to other members without your agreement. The Club Data Protection Officer will first contact you should a request be made.

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

**6.1** We will hold your personal data on our system 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 and or the purposes of our legitimate interests in operating and promoting the Club. 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 membership applications and legal obligations, e.g. compliance with tax requirements and exemptions, and the establishment, exercise or defence of legal claims.



## **7. Your rights and Responsibilities**

**7.1** 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

**7.2** You have the right to take any complaints about how we process your personal data to the Data Protection Commissioner.

**7.3** Members and Employees are responsible for:

- i.** Checking that any information that the Club holds is current and up-to-date
- ii.** Notifying the Club of any changes to information you have provided, for example changes of address, change of contact information and bank details etc.
- iii.** Ensuring that all parties are familiar with a following the Club Data Protection Policy

## **8. CCTV**

The Club operates a CCTV security system to protect the interest of members, visitors and the Club against criminal activity and it is only used for this purpose. There are notices to this effect around the Club. There is no CCTV in the Locker Rooms or toilet areas. The system will not be used to monitor the work patterns of the Golf Club's employees. Access to this footage is strictly prohibited except on written request from a member of an Garda Síochána or on foot of a court order. All such requests to access of footage must be made to the Honorary Secretary.

## **9. Policy Review**

The policy is to be reviewed on an annual basis or at such time that the Data Protection Act is amended. The Data Protection Commissioner provides extensive information and practical guidance on Data Protection on its website [www.dataprotection.ie](http://www.dataprotection.ie) and Thurles Golf Club will continue to inform itself further of its obligations by reviewing this site.

For more details, please address any questions, comments and requests regarding our data processing practice to Ashling Moroney, Club Data Protection Officer, Thurles Golf Club, who will consult with the Honorary Secretary who will brief the Governing Body as appropriate.

# Personal Data Security Breach Report Form

If you discover a personal data security breach, please notify the Club Data Protection Officer. Please complete this form and return to the Club Data Protection Officer as soon as possible.

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| <b>Notification of Data Security Breach</b>                              |  |
| Date(s) of Breach:   |  |
| Date Incident was discovered:  |  |
| Name of Person Reporting Incident:                                       |  |
| Contact Details of Person Reporting Incident:                            |  |
| Brief Description of Personal Data Security Breach:                      |  |
| Number of Data Subjects affected (if known):                             |  |
| Brief Description of any action since breach was discovered:             |  |
| Was incident reported to the Office of the Data Protection Commissioner: |  |
| <i>For information Compliance Office Use Only</i>                        |  |
| Report received by:  |  |
| Date:  |  |
| Action:  |  |
| Date:  |  |