Shropshire and Herefordshire Union of Golf Clubs (SHUGC)

Data Protection/Privacy Policy

1. What we need

1.1 Shropshire & Herefordshire Union of Golf Clubs. (SHUGC) is committed to maintaining the privacy and confidentiality of information provided by you to us. This privacy policy describes our current policies and practices in respect of personal data collected by us from you directly and / or through the website. The term 'personal data' refers to personally identifiable information about you as defined in the Data Protection Act 2018.

1.2 We are continuing to improve our methods of communication and because of changes in technology and changes in the law our data protection practices will change from time to time. If our data practices change, we will notify you accordingly.

1.3 SHUGC will be a "controller" of the personal information that you provide to us, unless otherwise stated. When you choose to play in competitions, request services or information, we may ask you for the following reasonably necessary personal information:

- contact details name, address, email address, and date of birth;
- criteria / category competitor, parent, volunteer, etc.; and
- equality information disability (if any), ethnic group, religious belief, gender identity and sexual orientation; and,
- health details if they may impact your participation in SHUGC activities, but only if you voluntarily provide the information.

2. Why we need your personal information – contractual purposes

2.1 We will use your personal data to fulfil your instructions and requirements and we will ask only for data that is adequate, relevant and not excessive for those purposes. Where we send you information for any purpose, it may be sent by email or post. When you book a place with us, we need to collect your personal information so that we can honour your booking and to enable you to participate in SHUGC activities. We will use your personal information to:

- contact you to inform you of our services or events;
- send you regular updates on issues we think will be of interest to you;
- send you requested information on our people and services;

• use your personal data in connection with your access to information and materials on our website;

- administer this website and help us improve our services;
- use your personal data in relation to or arising from our events and publications; and,
- issue invoices, manage accounts and records, and collection of payments and debts.

2.2 If you do not provide us with all the personal information that we need to collect, then this may affect our ability to offer the above services and benefits.

3. Why we need your personal information – legitimate purposes

3.1 We also process our members' personal information in pursuit of our legitimate interests to:

• promote and encourage participation in the sport of golf by sending communications and booking information for upcoming competitions and events. Our competitions and events may be filmed / photographed and your personal information may also be used in images captured from our competitions and events, which we use for promotional, education and development purposes;

• provide competition in the sport of golf by accepting and managing entries for our competitions and checking your personal information to ensure you are entered into the correct category;

• develop and maintain our members' qualifications, including sending email communications to members to inform you of upcoming courses, renewal requirements and verify that you have completed any mandatory training and DBS / child protection requirements;

• respond to and communicate regarding your questions, comments, support needs or complaints and concerns or allegations in relation to any of our activities and events. We will use your personal information to investigate your complaint, suspend membership and take disciplinary action where appropriate; and,

• for volunteers and others working with children and vulnerable adults, DBS information (certificate number, date of issue etc.) and references.

3.2 Where we process your personal information in pursuit of our legitimate interests, you have the right to object to us using your personal information for the above purposes. If you wish to object to any of the above processing, please contact us at secretary@shugc.com. If we agree and comply with your objection, this may affect our ability to undertake the tasks above for your benefit.

4. Why we need your personal information – legal obligations

4.1 We are under a legal obligation to process certain personal information for the purposes of complying with legislation such as The Companies Act 2006, The Safeguarding Vulnerable Groups Act 2006, The Children Act 2004 and the Equalities Act 2010.

5. Other uses of your personal information

5.1 We may ask you if we can process your personal information for additional purposes. Where we do so, we will provide you with information on how we will use your data for these additional purposes. For example, medical information confirming a player may use a buggy in SHUGC events and activities.

6. Who we share your personal information with

6.1 We do not share, sell, or distribute your personal data with unrelated third parties, except as otherwise provided for in this privacy policy and under these limited circumstances.

6.2 We may be required to share personal information with statutory or regulatory authorities and organisations to comply with statutory obligations. Such organisations include the Health & Safety Executive, Shropshire County Council, Herefordshire County Council and West Mercia Police for the purposes of safeguarding children.

6.3 We may also share personal information with our professional and legal advisors for the purposes of taking advice.

6.4 As SHUGC are affiliated the England Golf, we are required to ensure that all competitors are members of England Golf as a condition of affiliation. We may share limited personal data with England Golf when required who will become a controller of your personal information when they receive it. England Golf's privacy notice explains how they use your personal information and can be accessed here Data Protection - England Golf

6.5 If we do share personal information with external third parties, we will only share such personal information strictly required for the specific purposes and take reasonable steps to ensure that recipients shall only process the disclosed personal information in accordance with those purposes.

7. How we protect your personal information

7.1 Your personal data is collected anonymously via our website which is provided by Intelligent Golf (You can visit the website specific privacy policy by clicking on this link: https://www.intelligentgolf.co.uk/privacy). We use the technology to collect information about the

use of our website such as logging which pages of our website our visitors view, their IP addresses and which web browsers they use. This technology does not personally identify you - it simply enables us to compile statistics about our visitors and their use of our website.

7.2 Your personal information is securely stored in our filing system (electronic and hardcopy) and is only accessed by our staff and volunteers for the purposes of:

- Communication between players to facilitate the management of matches and competitions.
- Communication between County Officials and competitors to promote accessibility and enable the effective and smooth running of the County.
- Contact information may be passed to SHUGC database system to maintain up to date contact information.

8. How long we keep your personal information

8.1 We will only keep your personal information for as long as necessary to provide you with services and information. Unless otherwise stated we will keep digital data (such as email addresses and telephone numbers) for a period of 5 years. We will keep paper data (such as parental consent forms and paper competition entry forms) until the end of the season to which they relate.

9. Your rights

9.1 You can exercise any of the following rights by writing / email to us at:

Shropshire & Herefordshire Golf Union

Black Lion Stables The Fold, Dorrington Shropshire SY5 7JD Tel: 01743 718714

Email: secretary@shugc.com

Your rights in relation to your personal information are:

• you have a right to request access to the personal information that we hold about you by making a "subject access request";

• if you believe that any of your personal information is inaccurate or incomplete, you have a right to request that we correct or complete your personal information; you have a right to

request that we restrict the processing of your personal information for specific purposes; and,

• if you wish us to delete your personal information, you may request that we do so.

• Any requests received by SHUGC will be considered under applicable data protection legislation. If you remain dissatisfied, you have a right to raise a complaint with the Information Commissioner's Office at <u>www.ico.org.uk</u>

10. Unsubscribe

10.1 We hope you will be pleased with our information and services. However, if you do not wish to receive emails from us and want to be removed from our electronic mailing list, please email us at <u>secretary@shugc.com</u> with "email unsubscribe" in the subject heading. If you also wish to be removed from our postal database, please let us know by emailing us with "mail unsubscribe" in the subject heading or writing to the Secretary.

Approved at Admin Meeting May 2023