



## **GDPR (Data Protection) Policy):**

### **PRIVACY NOTICE**

#### **INTRODUCTION**

1.1. This Privacy Notice is for ALDERNEY GOLF CLUB (AGC).

1.2. We take our responsibilities as a data controller seriously and are committed to using the personal data we hold in accordance with the law.

1.3. This privacy notice provides detailed information about how we process personal data. Please read it carefully and, if you have questions regarding your personal data or its use, please contact The Secretary

#### **TYPES OF PERSONAL DATA WE PROCESS**

2.1. We process personal data about prospective, current and past members; staff, suppliers and contractors; donors, friends and sponsors; and other individuals connected to or visiting AGC.

2.2. The personal data we process takes different forms – it may be factual information, expressions of opinion, images or other recorded information which identifies or relates to a living individual. Examples include:

2.2.1. names, addresses, telephone numbers, e-mail addresses and other contact details;

2.2.2. bank details and other financial information, e.g. about those who pay fees to AGC;

2.2.4. past, present and prospective members' membership details;

2.2.5. In connection with the employment of staff, for example DBS checks, welfare or pensions;

#### **COLLECTING, HANDLING AND SHARING PERSONAL DATA**

3.1. We collect most of the personal data we process directly from the individual concerned.

3.2. Personal data held by us is processed by appropriate members of staff for the purposes for which the data was provided. We do not transfer personal data outside of the European Economic Area unless we are satisfied that the personal data will be afforded an equivalent level of protection.

3.3. In the course of AGC business, we may share personal data (including special category personal data where appropriate) with third parties such as the relevant authorities (eg the States of Alderney or Guernsey Housing Control, Income Tax, Social Security, Education Sports and Culture Department). Some of our systems are provided by third parties, eg hosted database at [howdido.com](http://howdido.com) for purposes of handicaps. This is always subject to contractual assurances that personal data will be kept securely and only in accordance with our specific directions.

3.4. For the most part, personal data collected by AGC will remain within AGC, and will be processed by appropriate individuals only in accordance with access protocols (i.e. on a 'need to know' basis).

#### **PURPOSES FOR WHICH WE PROCESS PERSONAL DATA**

4.1. We process personal data to support AGC operation as a golf club and in particular for:

4.1.1. The selection and admission of members;

4.1.8. The promotion of AGC through its own websites and other publications and communications (including through our social media channels); and

4.1.9. Maintaining relationships with members and the wider golf community.

## 1. HOW LONG WE KEEP PERSONAL DATA

5.1. We retain personal data only for a legitimate and lawful reason and only for so long as necessary or required by law, or following specific guidance from any regulatory bodies. We have adopted Records Retention Guidelines which set out the time period for which different categories of data are kept. If you have any specific queries about our record retention periods, or wish to request that your personal data is considered for erasure, please contact The Secretary.

## YOUR RIGHTS

6.1. You have various rights under Data Protection Law to access and understand the personal data we hold about you, and in some cases to ask for it to be erased or amended or for us to stop processing it, but subject to certain exemptions and limitations.

6.2. If you would like to access or amend your personal data, or would like it to be transferred to another person or organisation, or have some other objection to how your personal data is used, please make your request in writing to The Secretary

6.3. We will respond to any such written requests as soon as is reasonably practicable and in any event within statutory time-limits, which is one month in the case of requests for access to information. We will be better able to respond quickly to smaller, targeted requests for information. If the request is manifestly excessive or similar to previous requests, we may ask you to reconsider or charge a proportionate fee, but only where Data Protection Law allows it.

6.4. You should be aware that certain data is exempt from the right of access. This may include information which identifies other individuals, or information which is subject to legal privilege.

## CHANGE OF DETAILS

7.1. We try to ensure that all personal data held in relation to an individual is as up to date and accurate as possible.

Please notify AGC at [membership@alderneygolfclub.com](mailto:membership@alderneygolfclub.com) or write to Alderney Golf Club, Route Des Carriers, Alderney, GY9 3YD of any significant changes to important information, such as contact details, held about you.

## THIS POLICY

8.1. We will update this Privacy Notice from time to time. Any substantial changes that affect how we process your personal data will be notified on our website and to you directly, as far as practicable.

8.2. If you believe that we have not complied with this policy or have acted otherwise than in accordance with Data Protection Law, you should notify The Secretary. You can also make a referral to or lodge a complaint with the Office of the Data Protection Commissioner's Office, although the Commissioner recommends that steps are taken to resolve the matter with us before involving them. Service of legal proceedings by email will not be accepted.

The End