

# **Belvoir Park Golf Club**



**BELVOIR PARK  
GOLF CLUB**

## **Members & Visitors Privacy Notice**

## **Contents**

1. Introduction
2. Who we are?
3. The legal basis
  - Consent
  - Contractual Obligations
  - Legal Compliance
  - Legitimate Interest
4. When do we collect your personal data?
5. What sort of data do we collect?
6. How and why we process your data?
7. Processing your data for direct marketing.
8. How we protect your personal data?
9. How long will we keep your personal data?
10. Who do we share your personal data with?
11. Where your personal data may be processed?
12. What are your rights over your personal data?
13. How can you stop the use of your personal data for direct marketing?
14. Contacting the Regulator

## **1. Introduction**

Your privacy is of the utmost importance to us here at Belvoir Park Golf Club. This privacy notice explains in detail what information we collect and retain about you and how we store, process and keep it safe.

This notice will provide information regarding your rights and how we use your data, for example we will explain how long we hold your membership records for and how our 3<sup>rd</sup> party partners who provide our BRS booking system ensure your data safety.

Should any individual using our services require any future information please contact our General Manager.

## **2. Who Are We**

We are a private members golf Club situated at Newtownbreda, Belfast.

## **3. The Legal Basis**

There are four legal basis for which we may collect and process your personal data. These are outlined below.

### **Consent**

In certain situations, we can only collect and process your data based on your explicit consent. Examples of when we will seek your explicit consent include:

- Adding your details to our marketing list;
- Adding your details to our list to receive the Club's newsletter.

You will be required to tick a box to opt into these services.

We will seek your consent to process your data when we have no other basis to process this.

### **Contractual Obligations**

In certain circumstances we need to process your personal data to comply with our contractual obligations, that is to carry out the purpose of our membership agreement with you. Examples of this include:

- Processing your personal details for membership purposes in order to contact you via post or email.

### **Legal Compliance**

If the law requires us to, we may need to collect and process your data for legal compliance reasons. Examples of this include:

- In the event of an accident;
- Where we need to retain medical records relating to a specific data subject for Health and Safety reasons.

## **Legitimate Interest**

In certain situations, we require your data to follow our legitimate interests in a way which might reasonably be expected as part of running our business and which does not materially impact your rights, freedom or interests. Examples of this include:

- Passing your information to our golf professional for golfing purposes;
- We will also use your email or home address to send you direct marketing information by post, telling you about products and services that we think might interest you.

### **4. When do we collect your personal data?**

- When you visit our website and sign into our members page
- When you visit our website to book a round of golf
- When you sign up with the Club for annual membership
- When you sign a medical/health declaration
- When you connect with us on social media
- When you contact us by any means with queries, complaints etc
- When you comment on or review our services
- When you fill in documentation for example, in the event of an accident occurring on the golf course or elsewhere on the club's premises
- When you use our car park or golf course which has CCTV coverage for the security of both visitors and our employees. These systems may record your image during your visit.

### **5. What sort of personal data do we collect?**

- If you are a member we will collect; your name, gender, date of birth, home address, phone number, email addresses, joining date, details of any of your subscriptions, your proposer and seconder details
- Requests for single, society and corporate rounds of golf bookings
- If using our website, we may collect information utilising web-based cookies about the way you have used our site, the length of time you have spent on the site, pages viewed during visit and time exposed to particular pages
- Medical information (if necessary)
- Your image may be recorded on CCTV when you visit the Golf Club
- Your social media username, if you interact with us through social media channels

### **6. How and why we process your personal data?**

We want to ensure that we provide the best experience for both our members and day visitors. To do this we use your data to offer you promotions, products and services that are most likely to interest you.

The data privacy laws allow us to do this as part of our legitimate interest in understanding our visitors and providing the highest levels of service.

You will be asked to opt in or out of our marketing material however, should you refuse certain contact permissions we may not be able to provide you with information you require.

How we will use your personal data and why:

- To process any booking requests on BRS (our third party booking system). If we don't collect your personal data during checkout, we won't be able to process your request and comply with our legal obligation, and we may keep your details for a reasonable period afterwards in order to fulfil any contractual obligations such as refunds;
- To protect our visitors, premises and staff from crime, we operate CCTV systems on our courses and car park which record images for security reasons. We do this on the basis of our legitimate business interest;
- If we discover any criminal activity or alleged criminal activity through the use of CCTV we will process this data for the purposes of preventing or detecting unlawful acts;
- With your consent, we will use your personal data, preferences and details of transactions (via BRS) to keep you informed by email or post about relevant products, services or events that you may be interested in;
- We will use your data to contact you by email or post if your membership is reaching its renewal date based on our legitimate business reason to do so;
- To send communications required by law or which are necessary to inform you about any changes to the services we provide you. We have a legal obligation to process your information for this purpose.;
- We will process your personal data to process your membership based on our contractual obligation to do so. Should you choose to cancel your membership or resign for any reason we will only retain your membership category and name should you later wish to re-join the Club. All other information will be erased.

## **7. Processing your data for Direct Marketing**

We want you to be able to avail of any events or offers we may hold at the Club. However, unless we have your consent to do so, we cannot process your data for this reason. To allow us to keep sending you our best offers please opt in to our marketing agreement or if you would prefer not to receive this, please opt out.

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

We treat our members and visitor's data with the utmost care and take all appropriate steps to ensure this protection. We do this by:

- Ensuring access to your personal data is password protected and sensitive data (such as payment card information) is secured by SSL encryption;
- Ensuring any personal details such as membership forms are stored in a locked filing cabinet and not kept for longer than required by the Club;
- Ensuring that anyone processing personal data on our Club's computers lock the computer when they leave their workstation.

## **9. How long will we keep your personal data?**

When we collect your personal data, we will not keep the information for longer than is necessary for the purpose for which it was collected.

At the end of the retention period, your data will either be completely deleted or in the case of membership, the only data the Club will remain in possession of will be the resigned members' name and membership category.

Information relating to any accidents that occur within the club's grounds or house will be retained for a period of 5 years.

#### **10. Who do we share your personal data with?**

We sometimes share your information with trusted third parties. We will do this in the following cases:

- IT companies who support our website;
- Data Base Providers (for example our membership and handicap system providers);
- Our golf professional.

#### **11. Where your personal data may be processed?**

Your data will only be processed by Belvoir Park Golf Club and its mentioned partners within this notice. Your information will only be processed within the EU.

Should your data for any reason need to be processed or transferred outside of the EU, the Club will inform you of any reason and seek your explicit consent if necessary.

#### **12. What are your rights over your personal data?**

Your rights include the following;

- The right to access personal data that we hold on you, free of charge in most cases
- The correction of your personal data when incorrect, out of date or incomplete
- The right to have your data erased when you withdraw consent or object where we have no legitimate interest or once the purpose we hold the data has come to an end
- The right to opt in to direct marketing
- The right for us to stop processing consent-based data after you withdraw consent
- The right to request your data for portability

To access any information we hold on you, or to correct any information we hold please contact Julie George – Office Manager or Jim Cullen – General Manager.

If we choose not to action your request, we will explain to you the reasons for our refusal.

#### **13. How can you stop the use of your personal data for direct marketing?**

**You can stop the use of your personal data by:**

- Writing to the General Manager.

If you chose to opt out of our marketing communication and we will ensure you do not receive this communication in future.

#### **14. Contacting the Regulator**

If you feel that we have handled your data incorrectly or you are unhappy with our response to any requests you have made regarding the use of your personal data, you have the right to lodge a complaint with the Information Commissioner's Office. You can contact them by calling 0303 123 1113.

Or go online to [www.ico.org.uk/concerns](http://www.ico.org.uk/concerns).