

## General Data Protection Regulations (GDPR) – Notice to Members

### 1. Your rights, expectations and obligations

- a) Your Club stores and processes personal information about you in order to administer your Membership and purchases; and in order that it can communicate with you effectively about: your Membership, Club affairs, products and services available to you and Golfing/social events.
- b) The Club only stores data which is necessary and sufficient to meet those legitimate purposes
- c) You have the right to see any data held about you – please ask either the Director of Golf, Club Administrator or Membership and HR Director
- d) Except as indicated below in in the table below the Club will not release your data to any third party without your express permission and the Club will never sell/transfer your personal information to any third-party marketing company.
- e) While we assume that as a Club member you would want us to communicate with you, you may opt out of e-mail newsletter communication, although we may still communicate with you via e-mail in connection with the administration of your Membership.
- f) You can expect that the Club will keep your data secure and, with your help, accurate. Please keep us informed of any change to your data i.e. changes to your name, address, contact details and bank account details or if wish to amend your Membership category.

### 2. Personal Data stored and processed

The data about you is shown in the table below. Not all of this is strictly ‘Personal data’, but is shown for completeness and transparency.

System	Club Systems V1	<i>easycollect</i> ECM3 System	Crossover Technologies XPOS	Excel Spreadsheet
<b>Description of system</b>	Internet (‘cloud’) based golf administration system	Internet (‘cloud’) based direct debit collection system	PC-based system till system run on Pro-shop laptop	Statutory Members’ Register
<b>Method of data collection</b>	Either historically when V1 was installed or via Membership Application form, completed by a new member. Form stored in a locked filing cabinet and Application securely disposed of after 12 months	Direct Debit Mandate form completed by Member. Mandate Form stored in locked filing cabinet. Due to the DD Guarantee, the mandate is permanently retained.	Historically from V1 when system installed; new members when they place first order	From reports generated from V1 system.
<b>Data stored on system</b>	All members (items in <i>italics</i> are not stored for Social Members)	Only in respect of Golf Category Members who	Golfing Members who wish to operate a shop account:	All Voting Members of the Club:

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	<ul style="list-style-type: none"> <li>• Name, title and Date of Birth</li> <li>• Gender</li> <li>• Address and Telephone Numbers</li> <li>• E-mail address(es) if supplied by you</li> <li>• Bank Sort Code and account number (if you pay your subscriptions monthly)</li> <li>• Membership Category – chosen by you</li> <li>• Date Joined Club</li> <li>• Club Record number</li> <li>• <i>Central Database of Handicaps (CDH) number – generated automatically by CDH</i></li> <li>• <i>Playing Handicap – automatically generated based on playing history</i></li> <li>• <i>History of competitions entered and supplementary score cards submitted</i></li> <li>• Bar Card Number –allocated to you when card issued</li> <li>• Bar Card transaction history – generated by the bar’s EPOS system (in respect of bar transactions) and by V1 (in respect of competition entry fees and winnings)</li> <li>• Subscription Payment frequency</li> <li>• Finance Transactions – generated within V1 in respect of invoices issued and paid)</li> <li>• Subscription Renewal date</li> <li>• <i>Locker number if applicable</i></li> <li>• Freeform notes that help us to administer your ‘account’</li> </ul>	<p>elect to pay their subscription by monthly instalments:</p> <ul style="list-style-type: none"> <li>• Name and title</li> <li>• Date of Birth</li> <li>• Address</li> <li>• Telephone Nos</li> <li>• E-mail address(es) if supplied by you</li> <li>• Bank Sort Code and account number</li> <li>• Contract type</li> <li>• Unique reference number</li> </ul>	<ul style="list-style-type: none"> <li>• Name and Title</li> <li>• Address</li> <li>• Transaction history for ordered items</li> <li>• Account balance if you operate an active account</li> </ul>	<ul style="list-style-type: none"> <li>• Name and Title</li> <li>• Postal Address</li> <li>• Membership category</li> <li>• Date joined Wareham Golf Club Limited (01/04/2016 or date joined the Club as a voting Member if later)</li> </ul>

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<p><b>Purpose and legal basis for storing and processing this data</b></p>	<p><b>a) Administer the services and benefits intrinsic to your Membership i.e.</b></p> <ul style="list-style-type: none"> <li>Administer your Membership renewal</li> <li>Administer and keep records of your payments</li> <li>Administer and keep records of your bar transactions</li> <li>Administer and keep records of your playing and handicap history</li> </ul> <p><b>Legal basis:</b> Necessary for performing the Membership contract</p> <p><b>b) Communicate with you via post and/or e-mail about:</b></p> <ul style="list-style-type: none"> <li>Club News</li> <li>Golfing and social events</li> <li>Products and services offered by the Club Professionals</li> </ul> <p><b>You can elect not to receive e-mail or postal communication of this sort, but you may still receive communication related to your Membership</b></p> <p><b>Legal basis:</b> Pursuing legitimate interests, without having a disproportionately negative impact on an individual</p>	<p>If you have elected to pay your membership subscription monthly, we use <i>easycollect</i>, a specialist payment collection bureau, to collect direct debit payments for:</p> <ul style="list-style-type: none"> <li>Monthly subscriptions</li> <li>Annual England Golf/Dorset Golf Union affiliation fee</li> </ul> <p><b>Legal basis:</b> Necessary for performing the Membership contract with Members who elect to pay monthly</p>	<p>To provide you with the option of operating an account with the Proshop and keep a record of purchases which have a guarantee attached</p> <p><b>You can elect not to have a Proshop account</b></p> <p><b>Legal basis:</b> Pursuing legitimate interests, without having a disproportionately negative impact on an individual</p>	<p>As a Company limited by guarantee, we must hold a Register of Members which are the guarantors of the Company's net liabilities (with limited liability of £10).</p> <p><b>Legal Basis:</b> Statutory requirement</p>

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	<p>c) <b>Produce a Club Diary annually</b> to include a list of Members and their phone numbers.  <b>You can elect to be excluded from this list</b></p> <p><b>Legal basis:</b> Pursuing legitimate interests, without having a disproportionately negative impact on an individual</p>			
<p><b>Access and Security</b></p>	<p>Three people at the club have password access to the full system containing your personal details and control the data:</p> <ul style="list-style-type: none"> <li>• Membership &amp; HR Director</li> <li>• Director of Golf</li> <li>• Club Administrator</li> </ul> <p>The Assistant Professional has password access only to the golfing administration (handicaps, competitions) part of the system.</p> <p>Bar staff have swipe card access to your bar card transactions.</p> <p>In the event of a systems problem/query, Club Systems technical staff can access the database.</p>	<p>Two people at the club have password access to the full system containing your personal details and control the data:</p> <ul style="list-style-type: none"> <li>• Membership &amp; HR Director</li> <li>• Club Administrator</li> </ul> <p>In the event of a systems problem/query or a payment query, <i>easycollect</i> technical staff can access the database.</p>	<p>Only Proshop staff have password access to the system.</p>	<p>An electronic copy of the register is filed:</p> <ul style="list-style-type: none"> <li>• At the Club’s registered address, which is the address of the Club’s accountants</li> <li>• At the Club</li> </ul> <p>It is a public document, which in theory can be inspected by anybody.</p>

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<b>Release of data to 3<sup>rd</sup> parties</b>	<p>V1 synchronises your handicap changes with England Golf's Central Database of Handicaps (CDH) based on your unique CDH number.</p> <p>Other Clubs may interrogate the CDH and may therefore see your name, Home Club and handicap (e.g. in the event that you have entered a competition or are proposing to join them as a member).</p> <p>In the event of an emergency, or where Club management deem it to be in your interests (e.g. where a fellow member needs to organise a match with you), the Club may release your contact details to an individual.</p>	<p>None other than the natural processing of the direct debit 'call' to your bank.</p> <p>The Club has satisfied itself that <i>easycollect</i> will not misuse your data and will use it only for the purpose for which is collected and stored.</p>	None	The Register is available for inspection, but copies are not provided as a 'mailing list'
<b>Duration of storage</b>	<p>While you remain a member.</p> <p>Once you cease to be a member, your record is archived and only your name and date of leaving can be viewed. The record can be reinstated if you re-join or if there is a query about your previous membership (e.g. about your bar account or financial transactions)</p> <p>Annually we review the archive and permanently delete all records more than 12 months old.</p>	<p>While you remain a Member and pay your subscription monthly.</p> <p>Once you cease to be a member, or you cease to pay monthly your record is archived</p> <p>Because the Direct Debit Guarantee allows payers unlimited time to make indemnity claims, data retention in the archive is permanent.</p>	While you remain a Member	<p>The Register is updated monthly so:</p> <ul style="list-style-type: none"> <li>You may not appear on the register until you have been a Member for several weeks</li> <li>you may remain on the Register for a few weeks after the Club becomes aware that you are no longer a Member</li> </ul> <p>Earlier versions of the Register are deleted.</p>