

## Privacy Policy

Brampton Park Golf Club ("BPGC", "we", "us", "our") respects your privacy and is committed to protecting your personal data. This privacy notice will inform you as to how we look after your personal data, whether you are a Member, assistant, customer, supplier, business partner, or other third party we have a relationship with, and tell you about your privacy rights and how the law protects you.

### Important information and who we are

Purpose of this privacy notice

This privacy notice aims to give you information on how BPGC collects and processes your personal data through your use of our website, or offline when you provide us with personal data, for example in an application form, in person or over the telephone.

It is important that you read this privacy notice together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy notice supplements the other notices and is not intended to override them.

Controller

RB Golf Limited is the controller and responsible for your personal data.

RB Gold Ltd is responsible for overseeing questions in relation to this privacy notice. If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact Richard Beadles using the details set out below.

Contact details

Mr R Beadles  
Brampton Park Golf Club  
Buckden Road  
Brampton  
Huntingdon  
Cambridgeshire  
PE28 4NF  
Tel: 01480 434700

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

Changes to the privacy notice and your duty to inform us of changes

This version was last updated on 02 April 2019.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

Third-party links

Our website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

### 1. The data we collect about you

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together follows:

**Identity Data** - includes first name, maiden name, last name, username or similar identifier, Membership number, marital status, title, date of birth and gender.

- **Contact Data** - includes home address, work address, email addresses and telephone numbers.
- **Financial Data** - includes bank account and payment card details (where provided).
- **Transaction Data** - includes details about payments to and from you and any subscriptions or purchases made from us.
- **Technical Data** - includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website.
- **Profile Data** - includes your username and password, benefits which you may have taken advantage of as a Member, tournament history
- **Usage Data** - includes information about how you use Club V1, and services.
- **Marketing and Communications Data** - includes your preferences in receiving marketing from us and our third parties and your communication preferences.

We do not generally collect **Special Categories of Personal Data** about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union Membership, information about your health and genetic and biometric data). However, we may in certain circumstances require such information where we have a valid legal basis to process it. This will either be for a reason permitted by the applicable data protection laws or with your explicit consent.

#### **Criminal Records Data**

BPGC uses the Disclosure and Barring Service (DBS) to assist it in ensuring that those who take up appointments which require them to work with children, do not pose a risk to those children in its care. BPGC may therefore process criminal records data disclosed by the DBS (formerly known as CRB). This will be processed in accordance with the DBS Code of Practice for Registered Persons.

#### **If you fail to provide personal data**

Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter with you (for example, to provide you with goods or services). In this case, we may have to cancel a product or service you have with us, but we will notify you if this is the case at the time.

## **2. How is your personal data collected?**

We use different methods to collect data from and about you including through:

#### **Direct interactions**

You may give us your Identity, Contact, Profile and Financial Data by filling in forms renewing your Membership or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:

- apply for or renew your Membership;
- request marketing to be sent to you;
- enrol as an employee;
- enter a tournament; or
- book an event such as a golf society or party
- give us some feedback.

#### **Automated technologies or interactions**

As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies and other similar technologies. Please see our [cookie policy](#) for further details.

#### **Third parties or publicly available sources**

We may receive personal data about you from various third parties and public sources as set out below:

- Technical Data from the following parties' analytics providers such as Google based outside the EU;
- Identity and Contact Data from publicly available sources such as Companies House and the Electoral Register based inside the EU; or
- Any data available in the public domain, such as court results or news clips.

### 3. How we use your personal data

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract, we are about to enter or have entered into with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.

Generally, we do not rely on consent as a legal basis for processing your personal data however in certain circumstances it may be the only legal basis which we can rely open. Where we do need to rely on your consent it will be very clear at the point at which we collect the data from you that we are relying on your consent. Where we have obtained your consent to process certain personal data you have the right to withdraw your consent to that processing at any time by contacting us.

#### Purposes for which we will use your personal data

We have set out below, in table format, descriptions of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

The initial table is applicable to **all individuals** whose personal data is processed by BPGC. We have also included some additional tables to cover specific scenarios where we process your personal data

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. If you need more details about the specific legal grounds we are relying on to process your personal data where more than one ground has been set out in the table below then please do not hesitate to contact us.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register you or your company as a new supplier to the BPGC.	(a) Identity (b) Contact (c) Financial	Performance of a contract with you
If you purchase items from BPGC to process and deliver your order including:  (a) Manage payments, fees and charges  (b) Collect and recover money owed to us	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Marketing and Communications	(a) Performance of a contract with you  (b) Necessary for our legitimate interests (to recover debts due to us)
To manage our relationship with you which will include:  (a) Notifying you about changes to our terms or privacy policy  (b) Asking you for feedback or to participate in a survey	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications	(a) Performance of a contract with you  (b) Necessary to comply with a legal obligation  (c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)
To enable you to partake in a prize draw, competition or complete a survey	(a) Identity (b) Contact (c) Profile	(a) Performance of a contract with you  (b) Necessary for our legitimate interests (to study how individuals

	(d) Usage (e) Marketing and Communications	use our services, to develop them and grow our business)
To enable BPGC to administer and protect our business (including organising tournaments and functions) and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Technical	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise)  (b) Necessary to comply with a legal obligation
To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical	Necessary for our legitimate interests (to study how individuals use our products/services, to develop them, to grow our business and to inform our marketing strategy)
To use data analytics to improve our website, marketing, customer relationships and experiences	(a) Technical (b) Usage	Necessary for our legitimate interests (to define our audience, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)
To make suggestions and recommendations to you about goods or services that may be of interest to you	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile	Necessary for our legitimate interests (to develop our products/services and grow our business)

If you are a **Member** of The BPGC, the following table will also apply to your personal data which is processed by The PGA.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register you as a Member of the BPGC	(a) Identity (b) Contact (c) Financial	Performance of a contract with you
To manage our relationship with you which will include: (a) Renewing your Membership with BPGC (b) Collection of subscriptions	(a) Identity (b) Contact (c) Financial (d) Transaction	(a) Performance of a contract with you  (b) Necessary for our legitimate interests (to recover debts due to us)

(c) keep you updated through our monthly email newsletters	(e) Profile (f) Marketing and Communications	
To deliver relevant content, bulletins and advertisements to you about BPGC or about new Members benefits	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile (f) Marketing and Communications	Necessary for our legitimate interests (to develop the services which we deliver, to keep you informed and to grow our business)

## Marketing

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising.

### Promotional offers from us

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you (we call this marketing).

You will receive marketing communications from us if you have requested information from us or in the case of Members in relation to benefits available to Members, and, in each case, you have not opted out of receiving that marketing.

### Third-party marketing

We will get your express opt-in consent before we share your personal data with any company outside BPGC.

### Opting out

You can ask us or third parties to stop sending you marketing messages at any time by contacting us (using the above contact details) or by following the opt-out links on any marketing message sent to you or by contacting us at any time.

### Cookies

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly. For more information about the cookies we use, please see our [cookie policy](#).

### Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

## 4. Disclosures of your personal data

We may have to share your personal data with the parties set out below for the purposes set out in the table in paragraph 3 above.

- Service providers acting as processors based inside and outside the EU who provide IT and system administration services.
- Professional advisers acting as processors or joint controllers including lawyers, bankers, auditors and insurers based in the United Kingdom who provide consultancy, banking, legal, insurance and accounting services.
- HM Revenue & Customs, regulators and other authorities acting as processors or joint controllers based in the United Kingdom who require reporting of processing activities in certain circumstances.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

## 6. Data security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

## 7. Data retention

How long will you use my personal data for?

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

## 8. Your legal rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data. These rights include:

- **Request access** to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- **Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- **Request erasure** of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- **Object to processing** of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
- **Request restriction of processing** of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- **Request the transfer** of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- **Withdraw consent at any time** where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

If you wish to exercise any of the rights set out above, please contact us.

No fee usually required.

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

#### What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

#### Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.