



# Privacy Policy (2025)

## 1. INTRODUCTION

This Policy sets out the obligations of **Mytton Fold Golf Club** (“the Club”) regarding data protection and the rights of **Members, Visitors and Employees** (“data subjects”) under the **UK General Data Protection Regulation (UK GDPR)** and the **Data Protection Act 2018**.

“Personal data” means any information relating to an identified or identifiable natural person. An identifiable natural person is one who can be identified directly or indirectly, such as by name, identification number, contact details, or factors relating to that person’s identity.

This Policy sets out the procedures the Club must follow when handling personal data. These principles apply to all employees, contractors, volunteers or other parties acting for the Club.

The Club is committed to the lawful, fair and transparent handling of all personal data, respecting the rights and privacy of all individuals.

## 2. DATA PROTECTION PRINCIPLES

The Club must ensure that all personal data is:

- a) processed lawfully, fairly and transparently;
- b) collected for specified, explicit and legitimate purposes;
- c) adequate, relevant and limited to what is necessary;
- d) accurate and kept up to date;
- e) retained only for as long as necessary;
- f) kept secure using appropriate technical and organisational measures.

## 3. LAWFUL, FAIR AND TRANSPARENT PROCESSING

Processing shall be lawful only if at least one of the following applies:

- a) the data subject has given clear consent;
- b) processing is necessary for a contract;
- c) processing is required by law;
- d) processing is necessary to protect vital interests;

e) processing is necessary for a public task;

f) processing is based on legitimate interests (unless overridden by the data subject's rights).

## 4. PURPOSE LIMITATION

4.1 The Club collects and processes the personal data listed in **Section 21**. This includes data provided directly or via third parties (e.g., HMRC).

4.2 The Club will only process personal data for the purposes outlined in Section 21 and will inform data subjects of those purposes at the time of collection or, if received from a third party, within one month.

4.3 The Club processes personal data on the following bases:

- **Adult members:** legitimate interests of managing Club membership.
- **Adults assisting with junior activities:** legal obligation (safeguarding checks).
- **Junior members:** parental/guardian consent.
- **Visitors:** consent for limited-period processing (normally up to two years).
- **Accidents/incidents:** vital interests and legal obligations (H&S reporting).
- **Employees:** necessary for employment contract and legal requirements.

## 5. DATA MINIMISATION

Only data required for the stated purposes will be collected and processed.

## 6. ACCURACY

The Club aims to keep personal data accurate and up to date. Members will be reminded annually to check their details. Any identified inaccuracies will be rectified promptly.

## 7. STORAGE LIMITATION

The Club will retain personal data only as long as necessary:

- **Former members:** until financial accounts covering their last subscription year are completed.
- **Former employees:** up to **7 years** after employment ends.
- **Visitors/guests:** up to **2 years**, unless consent for future communications is given.

When data is no longer required, it will be securely erased.

## 8. SECURITY OF PERSONAL DATA

The Club will ensure all personal data is stored and processed securely. Further details of security measures are in Sections 22 and 23.

## 9. ACCOUNTABILITY

9.1 A formal DPO is not required; the Directors oversee compliance.

9.2 The Directors shall maintain records of processing activities, including:

- data categories,
- processing purposes,
- data subjects,
- recipients,
- retention periods,
- security measures,
- any transfers outside the UK.

## **10. DATA PROTECTION IMPACT ASSESSMENTS (DPIAs)**

The Club will conduct DPIAs where required—e.g., for new technologies, high-risk processing, or CCTV changes.

## **11. DATA SUBJECT RIGHTS**

Data subjects have the rights to:

- be informed,
- access,
- rectification,
- erasure,
- restrict processing,
- data portability (where automated processing applies),
- object,
- rights relating to automated decision-making.

## **12. PROVIDING INFORMATION TO DATA SUBJECTS**

The Club will provide all required privacy information at the time personal data is collected or within one month if obtained from third parties.

This includes contact details, purposes, legal basis, retention, rights, complaint routes, and any data sharing or international transfers.

## **13. SUBJECT ACCESS REQUESTS (SARs)**

SARs must be sent to the Directors. Responses will normally be provided within one month.

## **14. RECTIFICATION**

Incorrect or incomplete data will be rectified within one month. Third parties to whom data has been disclosed will also be notified.

## **15. ERASURE (“RIGHT TO BE FORGOTTEN”)**

Data subjects may request erasure under the conditions set out in UK GDPR. Unless legal obligation or overriding legitimate interest applies, the Club will comply within one month.

## **16. RESTRICTION OF PROCESSING**

When restriction is requested, the Club will stop processing except for storage or legal claims.

## **17. DATA PORTABILITY**

The Club does not use fully automated processing methods that trigger the portability requirement.

## **18. RIGHT TO OBJECT**

Data subjects may object to processing based on legitimate interests or for direct marketing. The Club will cease direct marketing immediately upon objection.

## **19. AUTOMATED DECISION-MAKING**

The Club does not use automated decision-making.

## **20. PROFILING**

The Club does not carry out profiling.

## **21. PERSONAL DATA HELD**

### **Members**

- Name, gender, date of birth
- Contact details
- Bank details (sort code, account number)
- Photograph (if provided)
- Disclosure checks (if relevant)
- Handicap and competition results

### **Visitors/Guests**

- Name, gender, DOB
- Temporary membership dates
- Green fee amounts
- Contact details

### **Employees**

- Name, gender, DOB
- Contact details
- Bank details
- National Insurance number and HMRC tax codes
- Pension contribution information

## 22. TECHNICAL SECURITY MEASURES

Key measures include:

- Password-protected emails containing personal data
- Secure deletion/shredding
- No transmission over unsecured networks
- Secure storage of physical and digital records
- No informal sharing of personal data
- Encrypted backups stored off-site
- Strong password policies
- No data stored on personal mobile devices
- Controlled staff access on a need-to-know basis

## 23. ORGANISATIONAL MEASURES

Measures include:

- Staff awareness and training
- Supervision of staff handling personal data
- Contracts requiring data protection compliance
- Regular policy review and performance monitoring
- Third-party processors must meet equivalent GDPR standards
- CCTV managed per ICO guidance and a separate CCTV Policy

## 24. INTERNATIONAL DATA TRANSFERS

As the Club operates under **UK GDPR**, international transfers now refer to transfers **outside the UK**, not the EEA.

Transfers will take place only where:

- the destination country has **UK adequacy regulations**,
- appropriate safeguards are in place (e.g., ICO International Data Transfer Agreement),
- consent has been given,
- required for a contract, vital interest, public interest, or legal claims.

## 25. DATA BREACHES

All breaches must be reported immediately to the Directors.

If the breach risks individuals' rights and freedoms, the ICO will be notified within 72 hours. High-risk breaches will also be reported directly to affected data subjects.

Notifications will include category and volume of data affected, likely consequences, and mitigation steps.

## **26. POLICY REVIEW**

This Policy is effective from **22 January 2021**, updated **2025**, and will be reviewed regularly. It applies only to matters arising after the effective date.