



Ardee Golf Club

Privacy Policy

May 2018

DATA PROTECTION POLICY

Purpose of this policy

This policy is a statement of Ardee Golf Club's commitment to protect the rights and privacy of individuals in accordance with the Data Protection Acts 1988 and 2003 and Data Protection Directive 95/46EU.

We are committed to complying with General Data Protection Regulation (GDPR).

As a Golf Club (Data Controller) we collect information about you that allows Committees and Staff the ability to perform their duties in the running of the club.

The personal data that we collect and hold about you may include:

Your Name, Address, Emergency Contact number, Email Address, Date of Birth, Gender, Handicap, Bank Details, Swipe Card Balances.

Personal Data may be collected through System Transactions, Application Forms and other hardcopy Forms for the purposes of Membership Proposals, Business and System Administration. It may also be collected through Contact Forms on our Website.

We use this information to allow us to fulfil our contractual obligations to you as a member in accordance with our club's articles/rules/constitution.

The Club may from time to time collect and retain personal data including sensitive personal data about employees, members and visitors from which individuals may be identified. While much of an individual's personal data will come directly from the individual himself/herself, there may be circumstances where personal data from other sources will be collected and retained by the Club.

What Is Personal Data?

Personal data is data relating to a living individual who is or can be identified either from the data or from the data in conjunction with other information that is in, or is likely to come into, the possession of the Data Controller (Ardee Golf Club). The data protection principles apply to any sort of personal data, which is either electronically processed (e.g. on a database) or which is held or intended to be in a structured filing system (e.g. a set of personnel files).

Certain personal data is classified as "sensitive personal data". This is personal data relating to a person's racial or ethnic origin, political opinions, religious or philosophical beliefs, membership of a trade union, physical or mental health, sexual life or any criminal offence or related proceedings.

Sharing your Data:

The Club does not propose disclosing your personal data to any third party outside the Club, save where required by law to do so under Directive 95/46EU.

All suppliers / contractors / partners of Ardee Golf Club who separately collect, control or process the content and use of personal data are individually responsible for compliance with the Data Protection Acts.

As part of our obligations to our Members and Visitors, we employ the services of a number of key 3rd Parties (Data Processors) to record and administer club activities. Information is collected and stored through e.g:

Club V1 for Handicap / Competition and Billing Administration / Internal Marketing and Communications

BRS Golf for Timesheet Bookings and Text Messaging

Sendmode for Txt Messaging and Marketing.

Website and Social Media for Correspondence / Queries

Insurance Companies for providing insurance cover.

IT Service Providers / Solicitors and Auditors

Law enforcement authorities

Our Data Processors **do not share** your information with other external companies without the consent of Ardee Golf Club.

Where you provide consent:

We may at times request your consent to process your personal data for specific reasons. For example we will request your consent to directly market products or services of third parties to you.

Data Protection Principles

We shall perform our responsibilities under the Data Protection Acts in accordance with the following Data Protection principles:

1. Obtain and process information fairly

We shall obtain and process personal data fairly and in accordance with statutory and other legal obligations.

2. Keep it only for one or more specified, explicit and lawful purposes

We shall keep personal data for purposes that are specific, lawful and clearly stated. Personal data will only be processed in a manner compatible with these purposes.

3. Use and disclose only in ways compatible with these purposes

We shall use and disclose personal data only in circumstances that are necessary for the purposes for which we collected the data.

4. Keep it safe and secure

We shall take appropriate security measures against unauthorised access to, or alteration, disclosure or destruction of personal data and against its accidental loss or destruction.

5. Keep it accurate, complete and up-to-date

We adopt procedures that ensure data accuracy, completeness and that data is up-to-date.

6. Ensure it is adequate, relevant and not excessive

We shall only hold personal data to the extent that it is adequate, relevant and not excessive.

7. Retain for no longer than is necessary

We will only keep information on individuals for as long as is necessary, for the purpose it was obtained, or as required or permitted for legal, fraud prevention and legitimate business purposes.

8. Give a copy of his/ her personal data to that individual, on request

We adopt procedures to ensure that data subjects can exercise their rights under the Data Protection legislation to access their data.

If you would like a copy of this information please email us at:

office@ardeegolfclub.com or write to:

The Data Protection Officer
Ardee Golf Club
Townparks, Ardee
Co Louth

9. Not transfer data outside the EEA

We will not transfer or allow transfer or storage of data outside the EU or EEA without adhering to applicable data protection law

Procedures and Guidelines

Ardee Golf Club is firmly committed to ensuring personal privacy and compliance with the Data Protection Acts, including the provision of best practice guidelines and procedures in relation to all aspects of Data Protection.

Your Rights Under the Data Protection Rules

The Acts give you (and anyone else about whom personal data is held) specific rights in relation to the information that is held about you.

Some of these rights are summarised below.

Under the Acts, you are able to:

- Obtain confirmation that the Club holds personal information about you, as well as a written description of the information, the purposes for which it is being used, the sources of the information and the details of any recipients
- Obtain access to the personal information, which is held about you it is important to note that this is not an absolute right to review all the information that is held about you, as there are various exceptions to this right contained in the Acts.

These include: where personal data is kept for the purpose of preventing, detecting or investigating offences and related matters, and

- Where the data is an expression of opinion about you given by another person in confidence
- In certain circumstances, you can ask for the deletion or rectification of information, which we hold about you, which is not accurate, or request that your personal information be used for specific purposes

Your Responsibilities Under the Data Protection Rules

As well as having rights under the Acts, all employees when processing personal data must comply with the data protection rules set out in this Policy.

Security Statement

Ardee Golf Club has taken measures to guard against unauthorised or unlawful processing of personal data and against accidental loss, destruction or damage.

This includes:

- Adopting an information security policy
- Taking steps to control physical security
- Putting in place controls on access to information
- Establishing a business continuity/disaster recovery plan
- Training all staff on security systems and procedures
- Detecting and investigating breaches of security should they occur

Personal Information Relating to Employees, Members and Visitors

If as part of a role or employment within the club, you hold any personal information about employees, clients or about anyone else, then you need to take steps to ensure that you are following these guidelines.

Please note that these guidelines apply equally to documents containing personal information which are kept in files, as well as data which is kept electronically.

- You should not keep personal information about people, which you no longer need or which is out of date or inaccurate.
You should review any personal information that you hold from time to time, bearing these principles in mind.
- All personal information must be kept securely and should remain confidential.
- If you receive a request from someone outside the club to give them any personal data about an employee or member (or other individual) you should refer them to the Data Protection Officer / Honorary Secretary.

The Club may verify the identity of the person making such a request and should balance various considerations when deciding whether and how to respond to such requests, including compliance with the Acts.

Accessing, disclosing or otherwise using employee / member records or other personal data without authority is a serious disciplinary offence.

If you are unsure about the application of these guidelines to the information you hold as part of your role or employment, you should contact your Data Protection Officer / Honorary Secretary for further guidance.

Review

This Data Protection Policy will be reviewed regularly in light of any legislative or other relevant developments.

We keep our privacy policy under regular review and will place any updates on our website. This privacy policy was last updated on 24/05/2018 *(Revision History at back of document)*

CONFIDENTIALITY POLICY

At Ardee Golf Club we maintain sensitive information about our employees and our members / suppliers because it helps us to serve them better. At the same time, trust is the foundation of our relationship, without that no Club can succeed. Nowhere is trust put more to the test than with the sensitive information we maintain about our employees and our members / suppliers. Both parties have a right to expect that we treat their information with the utmost respect, integrity and care.

Our Approach

The purpose of this policy is to ensure that the Club protects its intellectual property and commercial interests. We aim to promote a working environment built on trust and will share information with those who need it in order to do their job. This means that, in the course of their employment, employees will have access to information which must remain confidential.

Ardee Golf Club will respect the confidentiality of information obtained in the course of our business and not share information about employees, members or visitors to anybody outside the Club.

In return, Ardee Golf Club will maintain confidentiality of all information regarding employees, members or visitors. It is a breach of this policy to discuss privileged information with anybody outside the Club.

Scope

This policy sets out the obligations of Ardee Golf club in relation to confidentiality.

Confidential information could be:

- Personal information relating to employees, members, or former employees
- Financial information
- Information in relation to security/computer systems
- Operations Information
- Business Information
- Commercial Information
- Information relating to existing or prospective Members
- Information relating to existing or prospective suppliers

This list is not exhaustive

All notes, documents, records, memoranda, and writing made, received or obtained on any matters relating to the organisation, business, finance, members, suppliers, dealings or affairs of the Club shall be treated as confidential and shall remain our property and shall be delivered to the Club immediately upon request.

CCTV POLICY

Purpose

Closed Circuit Television Systems (CCTV) are installed in Ardee Golf Club. The purpose of this policy is to regulate the use of CCTV and its associated technology in the monitoring of both the internal and external environs of premises under the remit of Ardee Golf Club.

CCTVS are installed both internally and externally for the purpose of enhancing the security of the buildings, their associated equipment and occupants as well as creating a mindfulness among the occupants, at any one time, that a surveillance security system is in operation within and/or in the external environs of the premises.

Scope

This policy applies to all personnel and properties under the remit of Ardee Golf Club and relates directly to the location and use of CCTV, the monitoring, recording and subsequent use of such recorded material.

General. Principles

Ardee Golf Club has a statutory responsibility for the protection of its property, equipment and other plant as well as providing a sense of security to its employees and invitees to its premises. Ardee Golf Club owes a duty of care under the provisions of Health & Safety legislation and utilises CCTV systems and its associated monitoring and recording equipment as an added mode of security and surveillance for the purpose of enhancing the quality of life of its employees, members and visitors by integrating the best practices governing the public and private surveillance of its premises.

The primary aim of CCTV monitoring of all Ardee Golf Club premises is to deter crime and vandalism and to assist in the protection and safety of the said properties, their associated equipment and materials and occupants. However, CCTV footage may be used during an investigation. Footage obtained by CCTV cameras can be useful for establishing facts and can be used in arriving at a decision and may be used by management at their discretion.

Monitoring for security purposes will be conducted in a professional, ethical and legal manner and any diversion of the use of CCTV security technologies and personnel for other purposes is prohibited by this policy e.g. CCTV monitoring of political or religious activities.

Information obtained through video monitoring may only be released when authorised by the Honorary Secretary or the Data Protection Officer.

Supplying CCTV images to an Garda Síochána should be by written request which states that a criminal investigation is being carried out. If a verbal request is acceded to, where there is a degree of urgency, a formal written request should be obtained afterwards.

The code of practice for video monitoring prohibits monitoring based on the characteristics and classifications contained in Equality and other related legislation e.g. race, gender, sexual orientation, national origin, disability etc. Video monitoring of public areas, for security purposes, with the said establishment, is limited to uses that do not violate the reasonable expectation to privacy as defined by law.

When a data subject requests CCTV images he/she should supply a time frame of the recording.

This would refer to specific days and/or hours but a general request for all CCTV data held will not be acceptable.

Management and Use of CCTV

Any use of this system or materials produced which is frivolous, or for private purposes, or is otherwise inconsistent with the objectives and procedures outlined within this policy will be considered gross misconduct.

Information obtained through CCTV monitoring may only be viewed or released when authorised by the Data Protection Officer / Honorary Secretary.

All CCTV systems and associated equipment will be required to be compliant with this policy following its adoption by Ardee Golf Club.

Covert Recordings

The Club may only undertake covert recording with the written authorisation of the Data Protection Officer / Honorary Secretary. where:

- Informing the individual(s) concerned that the recording is taking place would seriously prejudice the reason for making the recording
- There is good cause to suspect that an illegal or unauthorised action(s) is/are taking place or about to take place

Any such monitoring will only be carried out for a limited and reasonable amount of time consistent with the objectives of the monitoring, and only for a specific unauthorised activity. All such occasions will be fully documented showing who made the decision to use covert monitoring and why.

Responsibilities

The Data Protection Officer / Honorary Secretary of Ardee Golf Club will:

- Oversee and coordinate the use of CCTV monitoring for safety and security purposes on the Club's premises
- Ensure that all existing CCTV monitoring systems will be evaluated for compliance with this policy
- Review camera locations and be responsible for the release of any information or material stored on any format in compliance with this policy
- Maintain a record of the release of tapes or any material recorded or stored in the system
- Ensure that images are stored for a period not longer than 30 days unless required for investigation
- Give consideration to members / employee petitions regarding possible invasion of privacy or confidentiality due to the location of a particular CCTV camera or associated equipment
- Ensure that all areas being monitored are not in breach of an enhanced expectation of the privacy of individuals and be mindful that no such infringement is likely to take place
- Ensure that adequate signage, at appropriate and prominent locations is displayed and include the following in such signage: "CCTV Cameras in Operation"
- Ensure that camera control is solely to monitor suspicious behaviour and not individual characteristics

How to contact us regarding this policy:

If you need any further information please:

E: office@ardeegolfclub.com

T: 041 6853227

P: Ardee Golf Club, Townparks, Ardee, Co. Louth

or write to:

The Data Protection Officer
Ardee Golf Club
Townparks, Ardee
Co Louth

Revision History

Date	Change Made	Reason	Made By
24/03/2018	Updated Various Areas	Pre-release (draft)	R.Phipps