



**PUTTENHAM**  
GOLF CLUB  
EST 1894

# DATA PROTECTION POLICY

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## CONTENTS

1	PURPOSE.....	2
2	SCOPE.....	2
3	POLICY STATEMENT .....	2
	3.1. Governance .....	2
	3.2. Data Protection Principles .....	3
	3.3. Data collection .....	3/4
	3.4. Data Use .....	4
	3.5. Data Retention.....	6
	3.6. Data Protection.....	7
	3.7. Data subject Requests .....	7
	3.8. Law Enforcement Requests & Disclosures .....	7
	3.9. Data Protection Training .....	8
	3.10. Data Transfers.....	8
	3.11. Complaints handling .....	8
	3.12. Breach Reporting.....	8
4	ROLES AND RESPONSIBILITIES.....	8
	4.1 Implementation.....	8
	4.2 Support, Advice and Communication .....	9
5	REVIEW .....	9
6	RECORDS MANAGEMENT .....	9
7	TERMS AND DEFINITIONS .....	9
8	RELATED LEGISLATION AND DOCUMENTS .....	9
9	FEEDBACK AND SUGGESTIONS .....	10
10	APPROVAL AND REVIEW DETAILS.....	10

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## 1 PURPOSE

This policy establishes an effective, accountable and transparent framework for ensuring compliance with the requirements of the GDPR.

## 2 SCOPE

This policy applies to all Puttenham Golf Club employees and all third parties responsible for the processing of personal data on behalf of Puttenham Golf Club services/entities.

## 3 POLICY STATEMENT

Puttenham Golf Club is committed to conducting its business in accordance with all applicable data protection laws and regulations and in line with the highest standards of ethical conduct.

This policy sets forth the expected behaviours of Puttenham Golf Club employees and third parties in relation to the collection, use, retention, transfer, disclosure and destruction of any personal data belonging to a Puttenham Golf Club contact (i.e. the data subject).

Personal data is any information (including opinions and intentions) which relates to an identified or identifiable natural person. Personal data is subject to certain legal safeguards and other regulations, which impose restrictions on how organisations may process personal data. An organisation that handles personal data and makes decisions about its use is known as a Data Controller. Puttenham Golf Club as a Data Controller, is responsible for ensuring compliance with the data protection requirements outlined in this policy. Non-compliance may expose Puttenham Golf Club to complaints, regulatory action, fines and/or reputational damage.

Puttenham Golf Club's leadership is fully committed to ensuring continued and effective implementation of this policy, and expects all Puttenham Golf Club employees and third parties to share in this commitment. Any breach of this policy will be taken seriously and may result in disciplinary action or business sanction.

### 3.1. Governance

#### 3.1.1. Data Protection by Design

To ensure that all data protection requirements are identified and addressed when designing new systems or processes and/or when reviewing or expanding existing systems or processes, each of them must go through an approval process before continuing. Puttenham Golf Club must ensure that a Data Protection Impact Assessment (DPIA) is conducted for all new and/or revised systems or processes for which it has responsibility. The subsequent findings of the DPIA must then be submitted to the Puttenham Golf Club Managing Secretary for review and approval.

#### 3.1.2. Compliance Monitoring

To confirm that an adequate level of compliance is being achieved by Puttenham Golf Club in relation to this policy, Puttenham Golf Club will carry out an annual data protection compliance audit. Each audit will, as a minimum, assess:

- Compliance with policy in relation to the protection of personal data, including:
  - The assignment of responsibilities.
    - ✓ Raising awareness.
    - ✓ Training of employees.
- The effectiveness of data protection related operational practices, including:
  - ✓ Data subject rights.
  - ✓ Personal data transfers.

- ✓ Personal data incident management.
- ✓ Personal data complaints handling.
- ✓ The level of understanding of data protection policies and privacy notices.
- ✓ The currency of data protection policies and privacy notices.
- ✓ The accuracy of personal data being stored.
- ✓ The conformity of data processor activities.
- ✓ The adequacy of procedures for redressing poor compliance and personal data breaches. Puttenham Golf Club will devise a plan with a schedule for correcting any identified deficiencies within a defined and reasonable time frame. Any major deficiencies in good practice identified will be reported to, monitored and shared by the Puttenham Golf Club Management Team.

### 3.2. Data Protection Principles

Puttenham Golf Club has adopted the following principles to govern its collection, use, retention, transfer, disclosure and destruction of personal data:

**Principle 1: Lawfulness, Fairness and Transparency.** Personal data shall be processed lawfully, fairly and in a transparent manner in relation to the data subject. This means, Puttenham Golf Club must tell the data subject what processing will occur (transparency), the processing must match the description given to the data subject (fairness), and it must be for one of the purposes specified in the applicable data protection regulation (lawfulness).

**Principle 2: Purpose Limitation.** Personal data shall be collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes. This means Puttenham Golf Club must specify exactly what the personal data collected will be used for and limit the processing of that personal data to only what is necessary to meet the specified purpose.

**Principle 3: Data Minimisation.** Personal data shall be adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed. This means Puttenham Golf Club must not store any personal data beyond what is strictly required.

**Principle 4: Accuracy.** Personal data shall be accurate and, kept up to date. This means Puttenham Golf Club must have in place processes for identifying and addressing out-of-date, incorrect and redundant personal data.

**Principle 5: Storage Limitation.** Personal data shall be kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data is processed. This means Puttenham Golf Club must, wherever possible, store personal data in a way that limits or prevents identification of the data subject.

**Principle 6: Integrity & Confidentiality.** Personal data shall be processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing, and against accidental loss, destruction or damage. Puttenham Golf Club must use appropriate technical and organisational measures to ensure the integrity and confidentiality of personal data is maintained at all times.

**Principle 7: Accountability.** The Data Controller shall be responsible for, and be able to demonstrate compliance. This means Puttenham Golf Club must demonstrate that the six data protection principles (outlined above) are met for all personal data for which it is responsible.

### 3.3. Data collection

#### 3.3.1. Data Sources

Personal data should be collected only from the data subject unless one of the following apply:

- The nature of the business purpose necessitates collection of the personal data from other persons or bodies.

- The collection must be carried out under emergency circumstances in order to protect the vital interests of the data subject or to prevent serious loss or injury to another person.

If personal data is collected from someone other than the data subject, the data subject must be informed of the collection unless one of the following apply:

- The data subject has received the required information by other means.
- The information must remain confidential due to a professional secrecy obligation
- A national law expressly provides for the collection, processing or transfer of the personal data.

Where it has been determined that notification to a data subject is required, notification should occur promptly, but in no case later than:

- One calendar month from the first collection or recording of the personal data
- At the time of first communication if used for communication with the data subject
- At the time of disclosure if disclosed to another recipient.

### **3.3.2. Data subject consent**

Puttenham Golf Club will obtain personal data only by lawful and fair means and, where appropriate with the knowledge and consent of the individual concerned. Where a need exists to request and receive the consent of an individual prior to the collection, use or disclosure of their personal data, Puttenham Golf Club is committed to seeking such consent. Puttenham Golf Club shall establish a system for obtaining and documenting data subject consent for the collection, processing, and/or transfer of their personal data.

### **3.3.3. Data subject Notification**

Puttenham Golf Club will, when required by applicable law, contract, or where it considers that it is reasonably appropriate to do so, provide data subjects with information as to the purpose of the processing of their personal data. When the data subject is asked to give consent to the processing of personal data and when any personal data is collected from the data subject, all appropriate disclosures will be made, in a manner that draws attention to them, unless one of the following apply:

- The data subject already has the information;
- A legal exemption applies to the requirements for disclosure and/or consent. The disclosures may be given orally, electronically or in writing. The associated receipt or form should be retained, along with a record of the facts, date, content, and method of disclosure.

### **3.3.4. External Privacy Notices**

Each external website provided by Puttenham Golf Club will include an online 'Privacy Notice' and an online 'Cookie Notice' fulfilling the requirements of applicable law.

## **3.4. Data Use**

### **3.4.1. Data processing**

Puttenham Golf Club uses the personal data of its contacts for the following broad purposes:

- The general running and business administration of Puttenham Golf Club.
- To provide services to Puttenham Golf Club's members & visitors.
- The ongoing administration and management of customer services.

The use of a contact's information should always be considered from their perspective and whether the use will be within their expectations or if they are likely to object. For example, it would clearly be within a contact's expectations that their details will be used by Puttenham Golf Club to respond to a contact request for information about the products and services on offer. However, it will not be within their reasonable expectations that Puttenham Golf Club would then provide their details to third parties for marketing purposes.

Puttenham Golf Club will process personal data in accordance with all applicable laws and applicable contractual obligations. More specifically, Puttenham Golf Club will not process personal data unless at least one of the following requirements are met:

- The data subject has given consent to the processing of their personal data for one or more specific purposes.
- Processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract.
- Processing is necessary for compliance with a legal obligation to which Puttenham Golf Club is subject.
- Processing is necessary in order to protect the vital interests of the data subject or of another natural person.
- Processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in Puttenham Golf Club.
- Processing is necessary for the purposes of the legitimate interests pursued by Puttenham Golf Club (except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject, in particular where the data subject is a child).
- In any circumstance where consent has not been gained for the specific processing in question, Puttenham Golf Club will address the following additional conditions to determine the fairness and transparency of any processing beyond the original purpose for which the personal data was collected: Any link between the purpose for which the personal data was collected and the reasons for intended further processing.
- The context in which the personal data has been collected, in particular regarding the relationship between data subject and Puttenham Golf Club.
- The nature of the personal data, in particular whether special categories of data are being processed, or whether personal data related to criminal convictions and offences are being processed.
- The possible consequences of the intended further processing for the data subject.
- The existence of appropriate safeguards pertaining to further processing, which may include encryption, anonymisation or pseudonymisation.

#### **3.4.2. Special Categories of Data**

Puttenham Golf Club will only process special categories of data (also known as sensitive data) where the data subject expressly consents to such processing or where one of the following conditions apply:

- The processing relates to personal data which has already been made public by the data subject.
- The processing is necessary for the establishment, exercise or defence of legal claims.
- The processing is specifically authorised or required by law.
- The processing is necessary to protect the vital interests of the data subject or of another natural person where the data subject is physically or legally incapable of giving consent.
- Further conditions, including limitations, based upon national law related to the processing of genetic data, biometric data or data concerning health.

In any situation where special categories of data are to be processed, the basis for the processing must be clearly recorded with the personal data in question. Where special categories of data are being processed, Puttenham Golf Club will adopt additional protection measures.

#### **3.4.3. Children's Data**

Children under the age of 14 are unable to consent to the processing of personal data for information society services (any service normally provided for payment, by electronic means and at the individual request of a recipient of services). Consent must be sought from the person who holds parental responsibility over the child. However, it should be noted that where processing is lawful under other grounds, consent need not be obtained from the child or the holder of parental responsibility.

#### 3.4.4. Data Quality

Puttenham Golf Club will adopt all necessary measures to ensure that the personal data it collects and processes is complete and accurate in the first instance, and is updated to reflect the current situation of the data subject. The measures adopted by Puttenham Golf Club to ensure data quality include:

- Correcting personal data known to be incorrect, inaccurate, incomplete, ambiguous, misleading or outdated, even if the data subject does not request rectification.
- Keeping personal data only for the period necessary to satisfy the permitted uses or applicable statutory retention period.
- The removal of personal data if in violation of any of the data protection principles or if the personal data is no longer required.
- Restriction, rather than deletion of personal data, insofar as:
  - ✓ a law prohibits erasure.
  - ✓ erasure would impair legitimate interests of the data subject.
  - ✓ the data subject disputes that their personal data is correct and it cannot be clearly ascertained whether their information is correct or incorrect.

#### 3.4.5. Profiling & Automated Decision Making

Puttenham Golf Club will only engage in profiling and automated decision-making where it is necessary to enter into, or to perform, a contract with the data subject or where it is authorised by law. Where Puttenham Golf Club utilises profiling and automated decision-making, this will be disclosed to the relevant data subjects. In such cases the data subject will be given the opportunity to:

- Express their point of view.
- Obtain an explanation for the automated decision.
- Review the logic used by the automated system.
- Supplement the automated system with additional data.
- Have a human carry out a review of the automated decision.
- Contest the automated decision.

Object to the automated decision-making being carried out. Puttenham Golf Club must also ensure that all profiling and automated decision-making relating to a data subject is based on accurate data.

#### 3.4.6. Digital Marketing

As a general rule Puttenham Golf Club will not send promotional or direct marketing material to a Puttenham Golf Club Contact through digital channels such as mobile phones, email and the Internet, without first obtaining their consent. Where personal data processing is approved for digital marketing purposes, the data subject must be informed at the point of first contact that they have the right to object, at any stage, to having their data processed for such purposes. If the data subject puts forward an objection, digital marketing related processing of their personal data must cease immediately and their details should be kept on a suppression list with a record of their opt-out decision, rather than being completely deleted. It should be noted that where digital marketing is carried out in a 'business to business' context, there is no legal requirement to obtain an indication of Consent to carry out digital marketing to individuals provided that they are given the opportunity to opt-out.

### 3.5. Data Retention

To ensure fair processing, personal data will not be retained by Puttenham Golf Club for longer than necessary in relation to the purposes for which it was originally collected, or for which it was further processed. The length of time for which Puttenham Golf Club needs to retain personal data is set out in Puttenham Golf Club '*Data Retention Policy*'. This takes into account the legal and contractual requirements, both minimum and maximum, that influence the retention periods set forth in the schedule. All personal data should be deleted or destroyed as soon as possible where it has been confirmed that there is no longer a need to retain it.

### 3.6. Data Protection

Puttenham Golf Club will adopt physical, technical, and organisational measures to ensure the security of personal data. This includes the prevention of loss or damage, unauthorised alteration, access or processing, and other risks to which it may be exposed by virtue of human action or the physical or natural environment. A summary of the personal data related security measures is provided below:

- Prevent unauthorised persons from gaining access to data processing systems in which personal data are processed.
- Prevent persons entitled to use a data processing system from accessing personal data beyond their needs and authorisations.
- Ensure that personal data in the course of electronic transmission during transport cannot be read, copied, modified or removed without authorisation.
- Ensure that access logs are in place to establish whether, and by whom, the personal data was entered into, modified on or removed from a data processing system.
- Ensure that in the case where processing is carried out by a Data Processor, the data can be processed only in accordance with the instructions of Puttenham Golf Club.
- Ensure that personal data is protected against undesired destruction or loss.
- Ensure that personal data collected for different purposes can and is processed separately.
- Ensure that personal data is not kept longer than necessary

### 3.7. Data subject Requests

Puttenham Golf Club will establish a system to enable and facilitate the exercise of data subject rights related to:

- Information access.
- Objection to processing.
- Objection to automated decision-making and profiling.
- Restriction of processing.
- Data portability.
- Data rectification.
- Data erasure. If an individual makes a request relating to any of the rights listed above

Puttenham Golf Club will consider each such request in accordance with all applicable data protection laws and regulations. No administration fee will be charged for considering and/or complying with such a request unless the request is deemed to be unnecessary or excessive in nature. Data subjects are entitled to obtain, based upon a request made in writing/email to: [enquiries@puttenhamgolfclub.co.uk](mailto:enquiries@puttenhamgolfclub.co.uk)

It should be noted that situations may arise where providing the information requested by a data subject would disclose personal data about another individual. In such cases, information must be redacted or withheld as may be necessary or appropriate to protect that person's rights. Detailed guidance for dealing with requests from data subjects can be found in Puttenham Golf Club's '*Data Subject Access Rights Policy and Procedure*' document.

### 3.8. Law Enforcement Requests & Disclosures

In certain circumstances, it is permitted that personal data be shared without the knowledge or consent of a data subject. This is the case where the disclosure of the personal data is necessary for any of the following purposes:

- The prevention or detection of crime.
- The apprehension or prosecution of offenders.
- The assessment or collection of a tax or duty.
- By the order of a court or by any rule of law.

If Puttenham Golf Club processes personal data for one of these purposes, then it may apply an exception to the processing rules outlined in this policy but only to the extent that not doing so would be likely to prejudice the case in question.

### **3.9. Data Protection Training**

All Puttenham Golf Club employees that have access to personal data will have their responsibilities under this policy outlined to them as part of their staff induction training. In addition Puttenham Golf Club will provide regular Data Protection training and procedural guidance for their staff.

### **3.10. Data Transfers**

Puttenham Golf Club may transfer personal data to internal or third party recipients located in another country where that country is recognised as having an adequate level of legal protection for the rights and freedoms of the relevant data subjects. Where transfers need to be made to countries lacking an adequate level of legal protection (i.e. third countries), they must be made in compliance with an approved transfer mechanism. Puttenham Golf Club may only transfer personal data where one of the transfer scenarios listed below applies:

- The data subject has given Consent to the proposed transfer.
- The transfer is necessary for the performance of a contract with the data subject
- The transfer is necessary for the implementation of pre-contractual measures taken in response to the data subject's request.
- The transfer is necessary for the conclusion or performance of a contract concluded with a third party in the interest of the data subject.
- The transfer is legally required on important public interest grounds.
- The transfer is necessary for the establishment, exercise or defence of legal claims.
- The transfer is necessary in order to protect the vital interests of the data subject

### **3.11. Complaints handling**

Data subjects with a complaint about the processing of their personal data, should put forward the matter in writing to Puttenham Golf Club. An investigation of the complaint will be carried out to the extent that is appropriate based on the merits of the specific case. Puttenham Golf Club will inform the data subject of the progress and the outcome of the complaint within a reasonable period. If the issue cannot be resolved through consultation between the data subject and Puttenham Golf Club, then the data subject may, at their option, seek redress through mediation, binding arbitration, litigation, or via complaint to the Data Protection Authority within the applicable jurisdiction.

### **3.12. Breach Reporting**

Any individual who suspects that a personal data breach has occurred due to the theft or exposure of personal data must immediately notify the Puttenham Golf Club Secretary/Manager providing a description of what occurred. Notification of the incident can be made via e-mail, by calling, or in person. The Secretary/Manager will investigate all reported incidents to confirm whether or not a personal data breach has occurred. If a personal data breach is confirmed, the Secretary/Manager will follow the relevant authorised procedure based on the criticality and quantity of the personal data involved. For severe personal data breaches, the Puttenham Golf Club Management Team will initiate and chair an emergency response team to coordinate and manage the personal data breach response.

## **4 ROLES AND RESPONSIBILITIES**

### **4.1 Implementation**

The management team of Puttenham Golf Club must ensure that all Puttenham Golf Club employees responsible for the processing of personal data are aware of and comply with the contents of this policy. In addition, Puttenham Golf Club will make sure all third parties engaged to process personal data on their behalf (i.e. their data processors) are aware of and comply with the contents of this policy. Assurance of such compliance must be obtained from all third parties, whether companies or individuals, prior to granting them access to personal data controlled by Puttenham Golf Club



## 4.2 Support, Advice and Communication

For advice and support in relation to this policy, please contact Puttenham Golf Club on 01483 810498 or email enquiries@puttenhamgolfclub.co.uk

## 5 REVIEW

This policy will be reviewed by Puttenham Golf Club every three years, unless there are any changes to regulations or legislation that would enable a review earlier.

## 6 RECORDS MANAGEMENT

Staff must maintain all records relevant to administering this policy and procedure in electronic form in a recognised Puttenham Golf Club recordkeeping system.

All records relevant to administering this policy and procedure will be maintained for a period of 5 years.

## 7 TERMS AND DEFINITIONS

**General Data Protection Regulation (GDPR):** the General Data Protection Regulation (GDPR) (Regulation (EU) 2016/679) is a regulation by which the European Parliament, the Council of the European Union and the European Commission intend to strengthen and unify data protection for all individuals within the European Union (EU). It also addresses the export of personal data outside the EU.

**Data Controller:** the entity that determines the purposes, conditions and means of the processing of personal data.

**Data Processor:** the entity that processes data on behalf of the Data Controller.

**Data Protection Authority:** national authorities tasked with the protection of data and privacy as well as monitoring and enforcement of the data protection regulations within the Union.

**Data subject:** a natural person whose personal data is processed by a controller or processor.

**personal data:** any information related to a natural person or 'data subject', that can be used to directly or indirectly identify the person.

**Privacy Impact Assessment:** a tool used to identify and reduce the privacy risks of entities by analysing the personal data that are processed and the policies in place to protect the data.

**Processing:** any operation performed on personal data, whether or not by automated means, including collection, use, recording, etc.

**Profiling:** any automated processing of personal data intended to evaluate, analyse, or predict data subject behaviour.

**Regulation:** a binding legislative act that must be applied in its entirety across the Union.

**Subject Access Right:** also known as the Right to Access, it entitles the data subject to have access to and information about the personal data that a controller has concerning them.

## 8 RELATED LEGISLATION AND DOCUMENTS

- Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation)
- The Data Protection Act 1998 (c 29) UK

## 9 FEEDBACK AND SUGGESTIONS

Puttenham Golf Club employees may provide feedback and suggestions about this document by emailing [enquiries@puttenhamgolfclub.co.uk](mailto:enquiries@puttenhamgolfclub.co.uk)

## 10 APPROVAL AND REVIEW DETAILS

Approval and Review	Details
Approval Authority	Puttenham Golf Club Board of Directors
Next Review Date	May/2021

Approval and Amendment History	Details
Original Approval Authority and Date	Puttenham Golf Club Board of Directors 18/04/2018
Amendment Authority and Date	<Add the previous approval authorities and amendment dates as Name DD/MM/YYYY; Name DD/MM/YYYY.>

## Privacy Notice

### 11 Introduction

This document refers to personal data, which is defined as information concerning any living person (a natural person who hereafter will be called the Data Subject) that is not already in the public domain.

The General Data Protection Regulation (GDPR) seeks to protect and enhance the rights of data subjects. These rights cover the safeguarding of personal data, protection against the unlawful processing of personal data and the unrestricted movement of personal data within the EU. It should be noted that GDPR does not apply to information already in the public domain.

Puttenham Golf Club is pleased to provide the following Privacy Notice:

### 12 Personal Data

Puttenham Golf Club uses the information collected from you to provide quotations, make telephone contact and to email you marketing information which Puttenham Golf Club believes may be of interest to you or your business. In you making initial contact you consent to Puttenham Golf Club maintaining a marketing dialogue with you until you either opt out (which you can do at any stage) or we decide to desist in promoting our services.

Some personal data may be collected about you from the forms and surveys you complete, from records of our correspondence and phone calls and details of your visits to our website, including but not limited to personally identifying information like Internet Protocol (IP) addresses. Puttenham Golf Club may from time to time use such information to identify our visitors. Puttenham Golf Club may also collect statistics about the behavior of visitors to our website.

Puttenham Golf Clubs' website uses cookies, which is a string of information that a website stores on a visitor's computer, and that the visitor's browser provides to the website each time the visitor returns. ClubView who host our website uses cookies to help Puttenham Golf Club identify and track visitors and their website access preferences. Puttenham Golf Club website visitors who do not wish to have cookies placed on their computers should set their browsers to refuse cookies before using Puttenham Golf Clubs' website.

### 13 Legal basis for processing any personal data

To meet Puttenham Golf Clubs' contractual obligations to customers and to also respond to enquiries.

### 14 Legitimate interests pursued by Puttenham Golf Club and/or its customers

To promote the services and/or products offered by Puttenham Golf Clubs' to existing customers.

### 15 Consent

Through agreeing to this privacy notice you are consenting to Puttenham Golf Club processing your personal data for the purposes outlined. You can withdraw consent at any time by emailing [enquiries@puttenhamgolfclub.co.uk](mailto:enquiries@puttenhamgolfclub.co.uk) or writing to us, see last section for full contact details or by clicking unsubscribe on any marketing email that is sent to you by Puttenham Golf Club

### 16 Disclosure

Puttenham Golf Club may on occasions pass your Personal Information to third parties exclusively to process work on its behalf. Puttenham Golf Club requires these parties to agree to process this information based on our instructions and requirements consistent with this Privacy Notice and GDPR.

Puttenham Golf Club do not sell or pass on information gained from your engagement with Puttenham Golf Club without your consent. However, Puttenham Golf Club may disclose your Personal Information to meet legal obligations, regulations or valid governmental request.

### 17 Retention Policy

Puttenham Golf Club will process personal data during the duration of any contract and will continue to store only the personal data needed for five years after the contract has expired to meet any legal obligations. After five years any personal data not needed will be deleted.

### 18 Data storage

Data is held in the United Kingdom using different (multiple) servers. Puttenham Golf Club does not store personal data outside the EEA.

### 19 Your rights as a data subject

At any point whilst Puttenham Golf Club is in possession of or processing your personal data, all data subjects have the following rights:

- **Right of access** - you have the right to request a copy of the information that we hold about you.
- **Right of rectification** - you have a right to correct data that we hold about you that is inaccurate or incomplete.
- **Right to be forgotten** - in certain circumstances you can ask for the data we hold about you to be erased from our records.
- **Right to restriction of processing** - where certain conditions apply you have a right to restrict the processing.
- **Right of portability** - you have the right to have the data we hold about you transferred to another organisation.
- **Right to object** - you have the right to object to certain types of processing such as direct marketing.
- **Right to object to automated processing, including profiling** - you also have the right not to be subject to the legal effects of automated processing or profiling.

In the event that Puttenham Golf Club refuses your request under rights of access, we will provide you with a reason as to why, which you have the right to legally challenge.

Puttenham Golf Club at your request can confirm what information it holds about you and how it is processed

## **20 You can request the following information:**

- Identity and the contact details of the person or organisation (Puttenham Golf Club) that has determined how and why to process your data.
- The purpose of the processing as well as the legal basis for processing.
- If the processing is based on the legitimate interests of Puttenham Golf Club or a third party such as one of its customers, information about those interests.
- The categories of personal data collected, stored and processed.
- Recipient(s) or categories of recipients that the data is/will be disclosed to.
- How long the data will be stored.
- Details of your rights to correct, erase, restrict or object to such processing.
- Information about your right to withdraw consent at any time.
- How to lodge a complaint with the supervisory authority (Data Protection Regulator).
- Whether the provision of personal data is a statutory or contractual requirement, or a requirement necessary to enter into a contract, as well as whether you are obliged to provide the personal data and the possible consequences of failing to provide such data.
- The source of personal data if it wasn't collected directly from you.
- Any details and information of automated decision making, such as profiling, and any meaningful information about the logic involved, as well as the significance and expected consequences of such processing.

## **21 To access what personal data is held, identification will be required**

Puttenham Golf Club will accept the following forms of ID when information on your personal data is requested: a copy of your driving license, passport, birth certificate and a utility bill not older than three months. A minimum of one piece of photographic ID listed above and a supporting document is required. If Puttenham Golf Club is dissatisfied with the quality, further information may be sought before personal data can be released.

All requests should be made to [enquiries@puttenhamgolfclub.co.uk](mailto:enquiries@puttenhamgolfclub.co.uk) or by phoning 01483 810498 or writing to us at the address further below.

## **Collection and Use of Employee Personal Information**

We also collect personal information from our employees and from job applicants (human resource data) in connection with administration of our human resources programs and functions. These programs and functions include, but are not limited to: job applications and hiring programs, compensation and benefit programs, performance appraisals, training, access to our facilities and computer networks, employee profiles, employee directories, human resource recordkeeping, and other employment related purposes. It is our policy to keep all past and present employee information private from disclosure to third parties. There are certain business related exceptions and they are:

- To meet legal obligations, regulations or valid governmental request.
- Inquiries from third parties with a signed authorisation from the employee to release the information.

- Third parties with which we have contractual agreements to assist in administration of company sponsored benefits.

Prospective employers, government agencies, financial institutions, and residential property managers routinely contact us requesting information on a former or current employee's work history and salary. All such requests of this type shall be referred to and completed on a confidential basis by the human resources department or payroll department. For written verification of employment requests, information will be provided only when it is accompanied by an employee's signed authorisation to release the information. The information will be then returned directly to the requesting party and filed as part of the human resources or payroll department's confidential records.

## **22 Complaints**

In the event that you wish to make a complaint about how your personal data is being processed by Puttenham Golf Club or its partners, you have the right to complain to Puttenham Golf Clubs' Secretary/Manager. If you do not get a response within 30 days you can complain to the Data Protection Regulator.

The details for each of these contacts are:

Puttenham Golf Club, attention of the Secretary Manager

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Data Protection Regulator

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