



**Kinross Golf Club,
Beeches Park
Kinross
KY13 8EU**

PRIVACY NOTICE

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Document Control

Reference: GDPR REC 4.1

Issue No: 2

Issue Date: September 2019

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1. Scope

This privacy notice applies to all individuals (data subjects) whose personal data is collected, in line with the requirements of the General Data Protection Regulation (EU) 2016/679 (GDPR) and the Data Protection Act 2018 (the Data Protection Laws).

2. Responsibilities

- 2.1 The Honorary Secretary is responsible for ensuring that this notice is made available to data subjects prior to Kinross Golf Club Ltd collecting/processing their personal data.
- 2.2 All Employees of Kinross Golf Club Ltd who interact with data subjects are responsible for ensuring that this notice is drawn to the data subject's attention.

3. Privacy notice

3.1 Who are we?

Kinross Golf Club Ltd (the Club) is a member only golf club, registered office at Golf Club House, Beeches Park, Kinross, KY13 8QZ, registration number SP1750RS

Our data protection representatives can be contacted directly here:

- Secretary@kinrossgolfclub.co.uk – Tel: 01577 862237
- office@kinrossgolfclub.co.uk – Tel: 01577 862237

The categories of personal data we will collect from and process in relation to you are:

Personal data type:	Source (where Kinross Golf Club Ltd obtained the personal data from if it has not been collected directly from you, the data subject):
Name	
Address	
Email Address	
Contact Telephone Number	
Date of Birth	
Bank Account details (eg Sorting Code & Account number) where required	
Handicap	Scottish Golf Ltd
CCTV images	

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The personal data we collect will be used for the following purposes:

- Sharing name and address information with all members via the Club's notice board as part of the process for approval of your membership application
- Communicating directly with you in any matters relating to the operation of the Club
- Sharing relevant contact information with other members to facilitate the completion of competitions (where appropriate)
- Provision of membership services including administration of golf competitions
- Undertaking member surveys from time to time
- Informing you of Club events, both golf competitions and social events
- Annual collection of subscriptions
- Ensuring members are allocated to the correct membership category and are able to take advantage of any age related discounts
- Maintenance of official Handicaps
- Monitoring the Club's premises for security purposes by CCTV

Our legal bases for processing the above personal data:

- The contractual agreement by a member and the Club, commencing when the member applies for membership of the Club
- The contractual agreement by visiting golfers when they apply for entry to open competitions
- The Club's legitimate interests in promoting the Club's competitions and social events and for the Club's security, provided these interests are not overridden by your interests

The Club requires you to provide the categories of personal data above to enable to the Club to register you as a member and manage your membership. We will inform you at the point of collecting personal data from you, whether you are required to provide the data to us.

3.2 Disclosure

The Club will only pass on your personal data to the third parties listed below. The following third parties will receive your personal data for the following purpose(s) as part of the processing activities:

Organisation	Information & Purpose
Kinross Estate Company Ltd	Name and email address will be provided to enable access to the BRS tee booking system.
Scottish Golf Ltd	Name and Handicap details as required under the national handicapping system
Premium Credit	Where a specific Premium Credit facility is requested. This will be covered by a separate Privacy Notice and Declaration provided by Premium Credit

3.3 Security of data

The Club has appropriate security measures in place to prevent your personal data from being accidentally lost, or used or accessed in an unauthorised way. The Club limits access to your personal data to those who have a genuine business need to know it.

The Club also has procedures in place to deal with any suspected data security breach. The Club will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so under the Data Protection Laws.

The Club will retain your personal data within the UK.

3.4 Retention period

The Club will process personal data until resignation from the Club. Thereafter, your personal data records will normally be retained for up to 18 months, (until the approval of the Club Accounts which cover the accounting period inclusive of your final subscription payment). The records may be retained beyond this retention timeframe in the event of legal actions (or potential legal actions) against or raised by the Club, or if a court order is received requiring the Club to retain a member's data, or in the event that the member has outstanding subscriptions when leaving.

3.5 Your rights as a data subject

At any point while we are in possession of or processing your personal data, you, the data subject, 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 to 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 to be subject to the legal effects of automated processing or profiling.

All of the above requests will be forwarded on should there be a third party involved (as stated in 3.2 above) in the processing of your personal data.

3.6 Complaints

In the event that you wish to make a complaint about how your personal data is being processed by the Club (or third parties as described in 3.2 above), or how your

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complaint has been handled, you have the right to lodge a complaint directly with the Club's data protection representative – the Honorary Secretary.

If the Club fails to resolve your complaint, you have a further right to lodge a complaint directly with the UK's supervisory authority for data protection – the Information Commissioner's Office.

The details for each of these contacts are:

	Supervisory authority contact details	Kinross Golf Club Ltd contact details
Contact Name:	Information Commissioner's Office	Honorary Secretary
Address line 1:	Wycliffe House	Golf Club House
Address line 2:	Water Lane	Beeches Park
Address line 3:	Wilmslow, Cheshire	Kinross
Address line 4:	SK9 5AF	KY13 8EU
Email/Website:	www.ico.org.uk/make-a-complaint/	secretary@kinrossgolfclub.co.uk
Telephone:	0303 123 1113	01577 862237

3.7 Website privacy statement

Read more about how and why we use personal data collected through our website here: <http://www.kinrossgolfclub.co.uk/policy.aspx>

3.8 Changes to this privacy notice

This privacy notice was published on 12th September 2019 and last updated on 12th September 2019.

We may change this privacy policy from time to time, when we do we will inform you via the Club's notice board and website.

Please contact us if you have any questions about this privacy notice or the personal data the Club holds about you.

Document Owner and Approval

The Honorary Secretary is the owner of this document and is responsible for ensuring that this record is reviewed in line with the review requirements of the GDPR.

A current version of this document is available to all members via the Club's Website.

Signature:

John Fraser

Date: 26/09/2019

Kinross Golf Club Ltd

Confidential

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Change History Record

Issue	Description of Change	Approval	Date of Issue
1	Initial issue	John Fraser	29/09/2019