

ELLESMERE GOLF CLUB PRIVACY POLICY

Ellesmere Golf Club (ECG) is committed to protecting your privacy. This Privacy Policy explains how the club collects and uses your personal data and which rights and options you have in this respect. Please also refer to our Cookie Policy which explains the use of cookies and other web tracking devices via our website. If you are a member of ECG, this and any other notices provided should be considered alongside the ECG club rules and your membership obligations and agreement.

Who is responsible for your personal data?

ECG is responsible for your personal data.

Which personal data does ECG collect?

The personal data ECG collects may include:

- Contact information, such as your name, date of birth, postal address, including your home address, where you have provided this to us, telephone number (if provided) and email address;
- Payment data, such as data necessary for processing payments and other related billing information in relation to membership subscriptions. Please note ECG does not retain bank or card details once payment has been processed via such methods.
- Further business information necessarily processed in a membership and/or contractual relationship with ECG.
- Information collected from publicly available resources.
- Handicap information and any information required to accurately calculate the same for the purposes of maintaining a handicap system recognised by world golf bodies.
- Details of your visits to our premises.

How does ECG collect your personal data?

ECG may collect personal data about you in a number of circumstances, including

- When you or your organisation seek any on-line services;
- When you or your organisation browse, make an enquiry or otherwise interact on our website;

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- To analyse and improve our services and communications to you;

V2/04/2018

- When you or your organisation offer to provide or provide services to us.

In some circumstances, we collect personal data about you from a third-party source. For example, we may collect personal data from your organisation, other organisations with whom you have dealings, government agencies, an information or service provider (e.g. How Did I Do or other golf clubs) or from a publicly available record.

Are you required to provide personal data?

As a general principle, you will provide us with your personal data entirely voluntarily; there are generally no detrimental effects for you if you choose not to consent or to provide personal data. However, there are circumstances in which ECG cannot take action without certain of your personal data, for example, because this personal data is required to process your membership and handicap rating, instructions, provide you with access to a web offering or newsletter or to carry out a legally required compliance screening. In these cases, it will unfortunately not be possible for us to provide you with what you request without the relevant personal data and we will notify you accordingly. ECG requires only sufficient data to enable it to comply with its regulatory and contractual and/or membership obligations. If you are not a member of ECG, your consent will be required before we send any newsletters, promotional offers or contact you for any purpose other than that for which you provided the data in the first instance.

For which purposes will ECG use your personal data?

We may use your personal data for the following purposes only ("**Permitted Purposes**"):

- Providing membership or other services or things you may have requested, including on-line.
- Managing and administering your or your organisation's business relationship with ECG, including private functions, processing payments, accounting, auditing, billing and collection, support services;
- Compliance with our legal obligations (such as record keeping obligations), compliance screening or recording obligations, which may include automated checks of your contact data or other information you provide about your identity etc, against applicable lists and/or data bases, contacting you to confirm your identity in case of a potential match or recording interaction with you which may be relevant for compliance purposes, this is particularly relevant to ECG employees.;
- To analyse and improve our services and communications to you;

- Protecting the security of and managing access to our premises, IT and communication systems, online platforms, websites and other systems, preventing and detecting security threats, fraud or other criminal or malicious activities;
- For insurance purposes;
- For monitoring and assessing compliance with our policies and standards;
- To identify persons authorised to trade on behalf of our members, customers, suppliers and/or service providers;
- To comply with our legal and regulatory obligations and requests anywhere in the world, including reporting to and/or being audited by national and international regulatory bodies;
- To comply with court orders and exercises and/or defend our legal rights; and
- For any purpose related and/or ancillary to any of the above or any other purpose for which your personal data was provided to us.

Where you have expressly given us your consent, we may process your personal data also for the following purposes:

- Communicating with you through the channels you have approved to keep you up to date on the latest developments, announcements and other information about ECG services, products and ECG events and projects;
- Membership/customer surveys, marketing campaigns, market analysis, contests or other promotional activities or events; or

With regard to marketing-related communication, we will - where legally required - only provide you with such information after you have opted in and provide you the opportunity to opt out anytime if you do not want to receive further marketing-related communication from us. We will not use your personal data for taking any automated decisions affecting you or creating profiles other than described above.

Depending on for which of the above Permitted Purposes we use your personal data, we may process your personal data on one or more of the following legal grounds:

- Because processing is necessary for the performance of a membership or customer instruction or other contract with you or your organisation;
- To comply with our legal obligations (e.g. to keep pension records or records for tax purposes); or
- Because processing is necessary for purposes of our legitimate interest or those of any third-party recipients that receive your personal data, provided that such interests are not overridden by your interests or fundamental rights and freedoms.

In addition, the processing may be based on your consent where you have expressly given that to us.

With whom will ECG share your personal data?

We may share your personal data in the following circumstances:

- If we have collected your personal data in the course of your membership of ECG, where permitted by law to others for the purpose of providing those services;
- To providers of handicap record keeping services, to help ECG and/or you measure your performance and to improve and promote our services;
- We may share your personal data with regulatory bodies with whom such personal data is shared e.g. in the case of employees HMRC etc.
- We may share your personal data with any third party to whom we assign or novate any of our rights or obligations;
- We may share your personal data with courts, law enforcement authorities, regulators or attorneys or other parties where it is reasonably necessary for the establishment, exercise or defence of a legal or equitable claim, or for the purposes of a confidential alternative dispute resolution process;
- We may also instruct service providers within or outside of ECG, domestically or abroad, e.g. shared service centres, to process personal data for the Permitted Purposes on our behalf and in accordance with our instructions only. ECG will retain control over and will remain fully responsible for your personal data and will use appropriate safeguards as required by applicable law to ensure the integrity and security of your personal data when engaging such service providers;
- We may also use aggregated personal data and statistics for the purpose of monitoring website usage in order to help us develop our website and our services.

Otherwise, we will only disclose your personal data when you direct us or give us permission, when we are required by applicable law or regulations or judicial or official request to do so, or as required to investigate actual or suspected fraudulent or criminal activities.

Personal data about other people which you provide to us

If you provide personal data to us about someone else (such as one of your directors or employees, or someone with whom you have business dealings) you must ensure that you are entitled to disclose that personal data to us and that, without our taking any further steps, we may collect, use and disclose that personal data as described in this Privacy Policy. In particular, you must ensure the individual concerned is aware of the various matters detailed in this Privacy Policy, as those matters relate to that individual, including our identity, how to contact us, our purposes of collection, our

personal data disclosure practices (including disclosure to overseas recipients), the individual's right to obtain access to the personal data and make complaints about the handling of the personal data, and the consequences if the personal data is not provided (such as our inability to provide services).

Keeping personal data about you secure

We will take appropriate technical and organisational measures to keep your personal data confidential and secure in accordance with our internal procedures covering the storage, disclosure of and access to personal data. Personal data may be kept on our personal data technology systems, those of our contractors or in paper files.

Transferring your personal data abroad

We may transfer your personal data abroad if required for the Permitted Purposes as described above. This may include countries which do not provide the same level of protection as the laws of your home country (for example, the laws within the European Economic Area or USA). We will ensure that any such international transfers are made subject to appropriate or suitable safeguards as required by the General Data Protection Regulation (EU) 2016/679 or other relevant laws. This includes entering into the EU Standard Contractual Clauses which are available. You may contact us anytime using the contact details below if you would like further information on such safeguards.

Updating personal data about you

If any of the personal data that you have provided to us changes, for example if you change your email address or if you wish to cancel any request you have made of us, or if you become aware we have any inaccurate personal data about you, please let us know by sending an email to Honsec@ellesmeregolfclub.co.uk. We will not be responsible for any losses arising from any inaccurate, inauthentic, deficient or incomplete Personal Data that you provide to us.

For how long do we retain your personal data?

Your personal data will be deleted when it is no longer reasonably required for the Permitted Purposes or you withdraw your consent (where applicable) and we are not legally required or otherwise permitted to continue storing such data. We will, in particular, retain your personal data where required for ECG to assert or defend against legal claims until the end of the relevant retention period or until the claims in question have been settled. Generally, ECG will not retain data beyond 7

years from the date of termination of any contractual relationship. If it becomes necessary to retain data beyond such a period, you will be provided a written explanation for the retention.

Your rights

Subject to certain legal conditions, you have the right to request a copy of the personal data about you which we hold, to have any inaccurate personal data corrected and to object to or restrict our using your personal data. You may also make a complaint if you have a concern about our handling of your personal data.

If you wish to do any of the above please send an email to Honsec@ellesmeregolfclub.co.uk. We may request that you prove your identity by providing us with a copy of a valid means of identification in order for us to comply with our security obligations and to prevent unauthorised disclosure of data. We will consider any requests or complaints which we receive and provide you with a response in a timely manner. If you are not satisfied with our response, you may take your complaint to the relevant privacy regulator. We will provide you with details of your relevant regulator upon request.

Updates to this Privacy Policy

This Privacy Policy was last updated in April 2018. We reserve the right to update and change this Privacy Policy from time to time in order to reflect any changes to the way in which we process your personal data or changing legal requirements. In case of any such changes, we will post the changed Privacy Policy on our website or publish it otherwise. The changes will take effect as soon as they are posted on this website.

How to get in touch with ECG

We welcome your views about our website and our Privacy Policy. If you would like to contact us with any queries or comments, please send an email to Honsec@ellesmeregolfclub.co.uk or send a letter address for the attention of the Data Manager, Ellesmere Golf Club, The Clubhouse, Old Clough Lane, Worsley, Manchester, M28 7HZ