



DATA PRIVACY POLICY for CASTLE GOLF CLUB

1. What is a Privacy Policy & Why is it important?

- 1.1 This policy explains when and why we collect personal information about our members, how we use it and how we keep it secure and your rights in relation to it.
- 1.2 We may collect, use and store your personal data, as described in this Data Privacy Policy and as described when we collect data from you.
- 1.3 We reserve the right to amend this Data Privacy Policy from time to time without prior notice. You are advised to check our website www.castlegc.ie or our Club noticeboard regularly for any amendments (but amendments will not be made retrospectively).
- 1.4 We will always comply with the General Data Protection Regulation (GDPR) when dealing with your personal data. Further details on the GDPR can be found at the website for the Data Protection Commissioner (www.dataprotection.ie or www.GDPRandYou.ie). For the purposes of the GDPR, we will be the “controller” of all personal data we hold about you.

2. Who are we?

- 2.1 We are Castle Golf Club. We can be contacted at Woodside Drive, Rathfarnham, Dublin 16, Ireland / +353 1 4904207 / info@castlegc.ie.

3. What personal information we collect and why?

Type of information	Purposes	Legal basis of processing
Member's name, address, telephone numbers, e-mail address/s.	Managing the Member's membership of the Club.	Performing the Club's contract with the Member. For the purposes of our legitimate interests in operating the Club.
Emergency contact details	Contacting next of kin in the event of emergency	Protecting the Member's vital interests and those of their dependants
Date of birth / age related information	Managing membership categories which are age related	Performing the Club's contract with the Member.

Gender	<p>Provision of adequate facilities for members.</p> <p>Reporting information to the GUI and ILGU.</p>	<p>For the purposes of our legitimate interests in making sure that we can provide sufficient and suitable facilities (including changing rooms and toilets) for each gender.</p>
The Member's name and handicap	<p>Managing competition entries and results.</p> <p>Sharing competition results with the GUI and ILGU.</p>	<p>For the purposes of our legitimate interests in holding competitions for the benefit of members of the Club.</p> <p>For the purposes of our legitimate interests in promoting the Club.</p> <p>For the purposes of our legitimate interests in operating the Club</p>
Photos and videos of Members and their guests	<p>Putting on the Club's website and social media pages and using in press releases.</p>	<p>Consent. We will seek the Member's consent on each new membership application form. Any Existing Member may withdraw their consent at any time by contacting us by e-mail or letter.</p>
The Member's name, e-mail address and telephone number	<p>Creating and managing the Club's online Membership Directory.</p>	<p>Consent. We will seek the Member's consent on each new membership application form.</p> <p>Any Existing Member may withdraw their consent at any time by contacting us by e-mail or letter to tell us that they no longer wish their details to appear in the Membership Directory</p>
Name, e-mail address and telephone number of each Club Officer	<p>Information may be published on Club's website, in Club's newsletter and other publications, in the Club's marketing materials and made available to the GUI and ILGU,</p>	<p>For the purposes of our legitimate interests in operating and promoting the Club</p>

	in each case as a point of contact at the Club	
Name, e-mail address and telephone number of each Club committee member	Information published on Club's website	For the purposes of our legitimate interests in operating and promoting the Club
Employees of the Club	Managing their employment at the Club.	For the purposes of our legitimate interests in operating the Club and the clubs relationship with our employees.
Representatives of suppliers to the Club	Entering into and managing arrangements with suppliers	Entering into and performing contracts with suppliers

4. How we protect your personal data

- 4.1 We have implemented generally accepted standards of technology and operational security in order to protect personal data from loss, misuse, or unauthorised alteration or destruction.
- 4.2 Please note however that where you are transmitting information to us over the internet this can never be guaranteed to be 100% secure.
- 4.3 For any payments which we take from you online we will use a recognised online secure payment system.
- 4.4 We will notify you promptly in the event of any breach of your personal data which might expose you to serious risk.

5. Who else has access to the information you provide us?

- 5.1 We will never sell your personal data. We will not share your personal data with any third parties without your prior consent (which you are free to withhold) except where we are required to do so by law or as set out in the table above or in paragraph 5.2 below.
- 5.2 We may pass your personal data to third parties who are service providers, agents and subcontractors to us for the purposes of completing tasks and providing services to you on our behalf (e.g. Tee time reservations, to send you mailings or text messages). We do this for the purpose of our legitimate interests in operating the Club and for performing our contract with you. However, we disclose only the personal data that is necessary for the third party to deliver the service and we have a contract in place that requires them to keep your information secure and not to use it for their own purposes. It is possible that third parties

may themselves engage others (sub processors) to process your data. Where this is the case third parties will be required to have contractual arrangements with their sub-processor(s) that ensure your information is kept secure and not used for their own purposes.

6. How long do we keep your personal information?

6.1 We will hold your personal data on our systems for as long as you are a member of the Club and for as long afterwards as is necessary to comply with our legal obligations. We will review your personal data every year to establish whether we are still entitled to process it.

If we decide that we are not entitled to do so, we will stop processing your personal data except that we will retain your personal data in an archived form in order to be able to comply with future legal obligations e.g. compliance with tax requirements and exemptions, and the establishment, exercise or defence of legal claims.

7. Your rights

7.1 You have rights under the GDPR:

- (a) to access your personal data
- (b) to be provided with information about how your personal data is processed
- (c) to have your personal data corrected
- (d) to have your personal data erased in certain circumstances
- (e) to object to or restrict how your personal data is processed
- (f) to have your personal data transferred to yourself or to another business in certain circumstances.

7.2 You have the right to take any complaints about how we process your personal data to the Data Protection Commissioner.

For more details, please address any questions, comments and requests regarding our data processing practices to John McCormack, General Manager, Castle Golf Club.