

# PRIVACY POLICY

Adopted Date: May 2018

Next Review: May 2019

This statement describes what types of information we collect from you, how it is used by us, how we share it with others, how you can manage the information we hold and how you can contact us.

## **Fair process notice/privacy notice**

- We only collect data if there are legitimate grounds for collecting and using the personal data
- We do not use the data in ways that have unjustified adverse effects on the individuals concerned
- We are transparent about how we intend to use the data, and give individuals appropriate privacy notices when collecting their personal data
- We handle people's personal data only in ways they would reasonably expect
- We make sure we do not do anything unlawful with the data

We will always give you the option not to receive marketing communications from us. We will never send you unsolicited 'junk' email or communications, or share your data with anyone else who might. We do not sell your information to third parties, but we do work closely with selected partners who help us to provide you with the information, products and services that you request from us. For example: HowDidIDo who provide a members platform for you to see your stats.

The contents of this statement may change from time to time so you may wish to check this page occasionally to ensure you are still happy to share your information with us. Where possible, we will also contact you directly to notify you of these changes.

## **What information do we collect?**

We collect information about you when you engage with our website and when you request membership to the club. We only collect information which is necessary, relevant and adequate for the purpose you are providing it for.

The information we collect includes some or all of the following:

1. Name
2. Address
3. Phone number
4. Date of birth
5. Email address
6. Cookies (see our Cookie Policy)
7. Details of any transactions between you and us
8. Where you engage with us in a business context, we may collect your job title, Company contact details, email addresses)
9. Images from our CCTV within the grounds of Kington Golf Club
10. Any information within correspondence you send to us

## **How do we use this information?**

Kington Golf Club will only process information that is necessary for the purpose for which it has been collected. You will always have the option not to receive marketing communications from us (and you can withdraw your consent or object at any time). We will never send you unsolicited 'junk' email or communications, or share your personal information with anyone else that might. There are various ways in which we may use or process your personal information. We list these below:

### **Consent:**

Where you have provided your consent, we may use and process your information to:

1. Contact you from time to time about promotions, events, products, services or information which we think may be of interest to you (don't worry, we won't bombard you).
2. To share your personal information with our recommended third party partners, so that they can contact you with marketing information about their products and services (we will, of course, give you details about these third parties before you give your permission for us to send information to them).

### **Child consent**

Kington Golf Club shall be able to demonstrate that, where the data subject has given explicit consent to the processing of his or her personal data, and the processing relates to a child under 16 years old, additional consent has been received by the person who is the holder of parental responsibility over the child. The Company shall be able to demonstrate that reasonable efforts have been made to establish the authenticity of the parental responsibility taking into consideration available technology.

You can withdraw your consent at any time by contacting us on the details below.

### **Contractual performance**

We may use and process your personal information where this is necessary to perform a contract with you and to fulfil and complete your membership subscriptions and other transactions entered into with us (or one of our authorised partners).

### **Legitimate Interests**

We may use and process your personal information as set out below where it is necessary for us to carry out activities for which it is in our legitimate interests as a business to do so.

Processing necessary for us to support members with sales and other enquiries

1. To respond to correspondence you send to us and fulfil the requests you make to us (for example: golf course bookings, reservations in the club restaurant & bar, venue hire).

Processing necessary for us to respond to understanding customers' needs

1. To analyse, evaluate and improve our products and services so that your visit and use of our website, applications, customer service and authorised partners are more useful and enjoyable (we will generally use data amalgamated from many people so that it doesn't identify you personally).
2. To undertake market analysis and research (including contacting you with customer surveys) so that we can better understand you as a customer and provide tailored offers, products and services that we think you will be interested in. We will only send marketing communications to you if you have provided your consent for us to do so or which we have obtained in the ways mentioned in the paragraph above.

Processing necessary for us to promote our business, brands and products and measure the reach and effectiveness of our campaigns

1. To send you marketing information from time to time after you have purchased a product or service from us or made a purchasing enquiry. We will only contact you with information about our own products and services (and in ways the law allows), which we hope you will like. You have the right to object to us sending you this information at any time.
2. To identify and record when you have received, opened or engaged with our website or electronic communications (see our Cookie Policy).
3. To administer competitions and promotions that you enter with us from time to time and to distribute prizes.

Processing necessary for us to operate the administrative and technical aspects of our business efficiently and effectively

1. To verify the accuracy of information that we hold about you and create a better understanding of you as a customer.
2. For network and information security purposes i.e. in order for us to take steps to protect your information against loss, damage, theft or unauthorised access.
3. To comply with a request from you in connection with the exercise of your rights (for example where you have asked us not to contact you for marketing purposes, we will keep a record of this on our database in order to be able to comply with your request).
4. To inform you of updates to our terms and conditions and policies.

### **Legal Obligation**

We may process your personal information to comply with our legal requirements.

Vital Interest: Sometimes we will need to process your personal information to contact you or your next of kin in case of an emergency.

### **How do we share this information?**

We do not sell your information to third parties, but we do work closely with our partners who fulfil business activities for us (like products, marketing, events and market research etc.)

We take steps to ensure that any third party partners who handle your information comply with data protection legislation and protect your information just as we do. We only disclose personal information that is necessary for them to provide the service that they are undertaking on our behalf. We will aim to anonymise your information or use aggregated non-specific data sets where ever possible.

### **How long do we keep your information for?**

We will not hold your personal information in an identifiable format for any longer than is necessary. If you are a customer or otherwise have a relationship with us we will hold personal information about you for a longer period than if we have obtained your details in connection with a prospective relationship.

If we have a relationship with you (e.g. you are a member), we hold your personal information for 7 years from the date our relationship ends. We hold your personal information for this period to establish, bring or defend legal claims. Our relationship may end for a number of reasons including where your membership has expired. Where we have obtained your personal information following a request for information, brochure, hospitality quotation or any other information on any of our products or services, we hold your personal information for 3 years from the date we collect that information, unless during that period we form a relationship with you e.g. you become a member, hire the venue. We hold your personal information for this period to give us an opportunity to form a relationship with you.

The only exceptions to the periods mentioned above are where:

- the law requires us to hold your personal information for a longer period, or delete it sooner
- where you have raised a complaint or concern regarding a product or service offered by us, in which case we will retain your information for a period of 7 years following the date of that complaint or query; or
- you exercise your right to have the information erased (where it applies) and we do not need to hold it in connection with any of the reasons permitted or required under the law (see further How can I manage the information we hold about you);

### **How can I manage the information we hold about you**

You have the right as an individual to access your personal information we hold about you and make corrections if necessary. You also have the right to withdraw any consent you have previously given us and ask us to erase information we hold about you. You can also object to us using your personal information (where we rely on our business interests to process and use your personal information).

You have a number of rights in relation to your personal information under data protection law. In relation to most rights, we will ask you for information to confirm your identity and, where applicable, to help us search for your personal information. Except in rare cases, we will respond to you within 30 days after we have received any request.

You have the right to:

1. Ask for a copy of the information that we hold about you.
2. Correct and update your information.
3. Withdraw your consent, where we rely on it, please see How do we use this information.
4. Object to our use of your information (where we rely on our legitimate interests to use your personal information) provided we do not have any continuing lawful reason to continue to use and process the information. When we do rely on our legitimate interests to use your personal information for direct marketing, we will always comply with your right to object.
5. Erase your information (or restrict the use of it), provided we do not have any continuing lawful reason to continue to use and process that information.
6. Transfer your information in a structured data file (in a commonly used and machine readable format), where we rely on your consent to use and process your personal information or need to process it in connection with your contract.

You can exercise the above rights and/or manage your information by contacting us using the details below:

If you have any specific data protection concerns or a complaint, you can address it to our Data Protection Officer:

Data Protection Officer: Nigel Venables

Office Address: Kington Golf Club,

Email: [info@kingtongolf.co.uk](mailto:info@kingtongolf.co.uk)

Telephone: 01544 230 340

General information can be directed to our customer service team:

Telephone: 01544 230 340

Email: [info@kingtongolf.co.uk](mailto:info@kingtongolf.co.uk)

Website: [www.kingtongolf.co.uk](http://www.kingtongolf.co.uk)

If you are unhappy, you have the right to lodge a complaint with a data protection regulator. The contact details for the Information Commissioner's Office, the data protection regulator in the UK, are below:

Post: Information Commissioner's Office Wycliffe House Water Lane Wilmslow Cheshire SK9 5AF

Phone: 0303 123 1113

Email: [casework@ico.org.uk](mailto:casework@ico.org.uk)