



PRIVACY POLICY

1. Introduction

This is the Privacy Policy of the Island Golf Club which is referred to as the “Club”, “us” or “we” throughout this Privacy Policy. This Privacy Policy provides details of the way in which we Process Personal Data in line with our obligations under Data Protection Law. Capitalised terms used in this Privacy Policy are defined in the Glossary in Annex I.

2. Background and Purpose

2.1 The purpose of this Privacy Policy is to explain what Personal Data we Process and how and why we Process it. In addition, this Privacy Policy outlines our duties and responsibilities regarding the protection of such Personal Data. The manner in which we Process data will evolve over time and we will update this Policy from time to time to reflect changing practices.

2.2 In addition, in order to meet our transparency obligations under Data Protection Law, we will incorporate this Privacy Policy by reference into various points of data capture used by us (e.g. application forms etc.).

3. The Club as a Data Controller

3.1 The Club will act as a Data Controller in respect of Personal Data provided to us by various individuals in connection with the operation and administration of The Club. Such individuals will generally include the following:

- (a) Members, former Members and council members;
- (b) Employees and contractors; and
- (c) visitors.

3.2 Personal Data is processed by The Club for the following purposes:

Purpose of Processing	Lawful Basis under GDPR
Communicating with and maintaining contact details of Members.	Such processing is necessary for the legitimate interests pursued by the Club pursuant to Article 6(1)(f) of the GDPR in particular to maintain communications with the Club's membership.
Membership services delivery and management e.g. to provide for the Club to consider new membership applications, for existing members to object to proposed Members, for Members to monitor their handicap, and for Members to organise to play golf together.	Such processing is necessary for the legitimate interests pursued by the Club as a golf club pursuant to Article 6(1)(f) of the GDPR
To evaluate Members' interests and to promote tailored offerings that reflect member interests e.g. to provide competitions and lessons which are most popular with members.	The Club has a legitimate interest in providing such offerings. We balance our legitimate interests against the rights of the individual users through the use of measures described in this Policy.
To provide for former Members to re-join the Club. Membership information is retained for this purpose.	The Club has a legitimate interest in providing such offerings. We balance our legitimate interests against the rights of the individual users through the use of measures described in this Policy.
Service administration e.g. providing individual users with membership fees reminders or providing notifications of a change in membership services.	Such processing is necessary for the provision of membership services to which the Member has signed up and to support the Club's legitimate interest in managing the delivery of its services.
Staff administration. Such data includes e.g. contact details and bank details.	Such processing is necessary for the performance of contracts and for compliance with legal obligations to which the Club is subject.
Service provision to visitors e.g. providing means for visitors to make bookings.	Such processing is necessary in the legitimate interest of the club as a golf club.
General correspondence with Members of the public (by post or the Club email addresses) for example where an individual sends correspondence to inquire about the Club or for other miscellaneous reasons.	For the particular purpose for which the correspondence is sent to the Club. Depending on the particular context of such correspondence the relevant lawful basis will likely be either the individual's consent or performance of the Club's legitimate interests pursued by the Club pursuant to Article 6(1)(f) of the GDPR
Running competitions.	It is necessary to process data to operate the relevant competitions. Additional uses of the data may arise where consent has been provided under the relevant competition rules.

4. The Club and Data Processors

4.1 The Club will engage certain service providers including Danny Cawley Catering, David Costigan – PGA Professional, BRS and Smart Golf to perform certain services on its behalf which may involve the Processing of Personal Data. To the extent that such Processing is undertaken based on the instructions of The Club and gives rise to a Data Controller and Data Processor relationship, The Club will ensure that such relationship is governed by a contract which includes the data protection provisions prescribed by Data Protection Law.

5. Record Keeping

5.1 As part of our record keeping obligations under Art. 30 GDPR, The Club retains a record of the Processing activities under its responsibility. This comprises the following:

Art. 30 GDPR Requirement	The Club's Record
Name and contact details of the Controller	John Lawler john@theislandgolfclub.com
The purposes of the processing	See Section 3 of this Privacy Policy.
Description of the categories of data subjects and of the categories of personal data.	See Annex II of this Privacy Policy.
The categories of recipients to whom the Personal Data have been or will be disclosed.	See Section 9 of this Privacy Policy.
Where applicable, transfers of personal data to a third country outside of the EEA.	See Section 9 of this Privacy Policy.
Where possible, the envisaged time limits for erasure of the different categories of data.	See Section 10 of this Privacy Policy.
Where possible, a general description of the technical and organisational security measures referred to in Article 32(1).	IT Security measures include access control through the use of passwords and automatic locking of computers and firewalls and anti-virus programmes.

6. Special Categories of Data

The Club processes Special Categories of Data (“SCD”) in certain circumstances, such as the ordinary course of employee administration. The Club shall Process such SCD in accordance with Data Protection Law.

7. Individual Data Subject Rights

7.1 Data Protection Law provide certain rights in favour of data subjects. The rights in question are as follows (the “Data Subject Rights”):

- (a) The right of a data subject to receive detailed information on the processing (by virtue of the transparency obligations on the Controller);
- (b) The right of access to Personal Data;
- (c) The right to rectify or erase Personal Data (right to be forgotten);
- (d) The right to restrict Processing;
- (e) The right of data portability; and
- (f) The right to object to automated decision making, including profiling where the Club relies on its legitimate or those of a third party to Process Personal Data.

7.2 These Data Subject Rights will be exercisable by you subject to limitations as provided for under Data Protection Law. You may make a request to The Club to exercise any of the Data Subject Rights by contacting John Lawler at john@theislandgolfclub.com. Your request will be dealt with in accordance with Data Protection Law.

8. **Data Security and Data Breach**

8.1 We have technical and organisational measures in place to protect Personal Data from unlawful or unauthorised destruction, loss, change, disclosure, acquisition or access. Personal Data are held securely using a range of security measures including, as appropriate, physical measures such as locked offices, locked filing cabinets, IT measures such as automatic computer locking, and restricted access through approvals and passwords. For more information on security measures see Annex III.

8.2 The GDPR obliges Data Controllers to notify the Data Protection Commission and affected data subjects in the case of certain types of personal data security breaches. Any Data Breaches identified in respect of Personal Data controlled by The Club will be dealt with in accordance with Data Protection Law.

9. **Disclosing Personal Data**

From time to time, we may disclose Personal Data to third parties, or allow third parties to access Personal Data which we Process (for example where a law enforcement agency or regulatory authority submits a valid request for access to Personal Data). We may also disclose Personal Data to: (a) selected third parties including BRS and Secure Golf; and (b) service providers, such as Danny Cawley Catering and David Costigan – PGA Professional.

10. **Data Retention**

We will keep Personal Data only for as long as the retention of such Personal Data is deemed necessary for the purposes for which that Personal Data are Processed (as described in this Privacy Policy). When a Member resigns from the Club, the membership information is kept securely on file for a period of 10 years following resignation. Members who apply to re-join the Club within a 10 year period of leaving the Club, may do so without further payment of an entrance fee. By retaining the information of the member, it allows the Club to forego a further entrance fee payment from the member. Any member who wishes to have his/her

personal data erased permanently from the Club records can request this from the General Manager. The request will be respected.

11. **Data Transfers outside the EEA**

From time to time, The Club may transfer Personal Data to countries outside the EEA which may not have the same or equivalent Data Protection Law as Ireland. If such transfer occurs, The Club will ensure that such processing of your Personal Data is in compliance with Data Protection Law and, in particular, that appropriate measures are in place such as entering into Model Contractual Clauses (as published by the European Commission) or ensuring that the recipient is Privacy Shield certified, if appropriate. If you require more information on the means of transfer of your data or would like a copy of the relevant safeguards, please contact John Lawler at john@theislandgolfclub.com.

13. **Data Protection Officer**

The Club is not required to appoint a Data Protection Officer as it does not meet the requirements necessary to do so under Article 37 GDPR. The Club takes data protection seriously and the General Manager, John Lawler, has been designated to deal with data protection matters. Please direct any data protection queries or issues to John at john@theislandgolfclub.com.

14. **CCTV**

The Club has a Closed Circuit Television (“**CCTV**”) security system in operation for external areas and some internal areas of the buildings. There are no CCTV cameras in the locker room or toilet areas. It is in the legitimate interest of the Club and the Members that the deterrent and recording capability of CCTV is in operation to prevent theft. The information gathered is only used for the purposes of security. The only third party that may gain access to CCTV footage is An Garda Síochána in the event of a security breach. Security footage is not held indefinitely and the recordings are automatically cleared off the system within a three week period.

15. **Data Protection Breach**

15.1 The Club takes its data protection responsibilities seriously and will comply with its obligations regarding data protection breaches under Data Protection Law.

12. **Further Information/Complaints Procedure**

12.1 For further information about this Privacy Policy and/or the Processing of your Personal Data by or on behalf of The Club please contact John Lawler at john@theislandgolfclub.com. While you may make a complaint in respect of our compliance with Data Protection Law to the Irish Data Protection Commission, we request that you contact John Lawler at john@theislandgolfclub.com in the first instance to give us the opportunity to address any concerns that you may have.

Date: 25 May 2018

ANNEX I

Glossary

In this Privacy Policy, the terms below have the following meaning:

“Data Breach” means a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, Personal Data transmitted, stored or otherwise Processed.

“Data Controller” means the entity which, alone or jointly with others, determines the purposes and means of the processing of Personal Data.

“Data Processor” means the party that Processes Personal Data on behalf of the Data Controller.

“Data Protection Law” means the General Data Protection Regulation (No 2016/679) (**“GDPR”**) and the [Data Protection Act 2018] and any other laws which apply to The Club in relation to the Processing of Personal Data.

“European Economic Area” or **“EEA”** means Austria, Belgium, Bulgaria, Croatia, Republic of Cyprus, Czech Republic, Denmark, Estonia, Finland, France, Germany, Greece, Hungary, Ireland, Italy, Latvia, Lithuania, Luxembourg, Malta, Netherlands, Poland, Portugal, Romania, Slovakia, Slovenia, Spain, Sweden, the UK, Iceland, Liechtenstein, and Norway.

“Personal Data” is any information relating to a living individual which allows the identification of that individual. Personal Data can include:

- a name, an identification number;
- details about an individual’s location; or
- any other information that is specific to that individual.

“Processing” means any operation or set of operations which is performed on Personal Data or on sets of Personal Data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction. **“Process”** and **“Processing”** are interpreted accordingly.

“Special Categories of Personal Data” are types of Personal Data that reveal any of the following information relating to an individual: racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership. Special Categories of Personal Data also include the Processing of genetic data, biometric data (for example, fingerprints or facial images), health data, data concerning sex life or sexual orientation and any Personal Data relating to criminal convictions or offences.

ANNEX II

Types of Personal Data

Categories of Data Subject	Type of Personal Data
Members (including potential Members and former Members)	Name, address, contact phone numbers, contact email address, date of birth, membership movements, information in relation to subscription and entrance fees paid, information on member's handicap and information on Members who proposed and seconded Members for membership.
Staff	Name, address, contact phone numbers, contact email address, emergency contact name and phone number, date of birth, PPS number, P45, and bank account details.
Visitors	Name, address (including country of residence), contact phone number and contact email address.