



Data Protection Policy Information

This policy applies to:

- Woodside Golf Club;
- LeisureChain Ltd;
- all staff operating on behalf of Woodside Golf Club/LeisureChain Ltd.
- It applies to paid staff and volunteers.

Policy operational date:

- With effect from: May 18, 2018
- Policy prepared by: Sarah Nixon
- Date approved by Management:
- Policy review date: May 18 2024

Introduction

The purpose of this policy is to enable LeisureChain Ltd to:

- comply with the law in respect of the data it holds about individuals;
- follow good practice;
- protect Leisure Chain Ltd's supporters, staff and other individuals
- protect the organisation from the consequences of a breach of its responsibilities.

The Data Protection Principles require that personal information is:

- processed fairly and lawfully
- processed for limited purposes
- adequate, relevant and not excessive
- accurate and up to date
- not kept for longer than is necessary
- processed in line with the rights of individuals
- secure
- not transferred to other countries without adequate protection
- given freely with full information on how it is to be used.

This policy applies to information relating to identifiable individuals, even where it is technically outside the scope of the Data

Protection Act, by virtue of not meeting the strict definition of 'data' in the Act. Policy statement

LeisureChain Ltd will:

- comply with both the law and good practice
- respect individuals' rights
- be open and honest with individuals whose data is held
- provide support for staff and volunteers who handle personal data, so that they can act confidently and consistently

LeisureChain Ltd has identified the following potential key risks, which this policy is designed to address:

- Breach of confidentiality (information being given out inappropriately).
- Insufficient clarity about the range of uses to which data will be put — leading to Data Subjects being insufficiently informed
- Breach of security by allowing unauthorised access.
- Failure to establish efficient systems of managing changes leading to personal data being not up to date.
- Harm to individuals if personal data is not up to date.
- Insufficient clarity about the way staff or volunteers' personal data is being used e.g. given out to general public.

Responsibilities

The Board of Directors recognises its overall responsibility for ensuring that LeisureChain Ltd complies with its legal obligations.

All staff and volunteers are required to read, understand and accept any policies and procedures that relate to the personal data they may handle in the course of their work.

Significant breaches of this policy will be handled under LeisureChain Ltd's disciplinary procedures.

Security

This section of the policy only addresses security issues relating to personal data. It does not cover security of the building, business continuity or any other aspect of security.

LeisureChain Ltd has identified the following risks:

- Staff or volunteers with access to personal information could misuse it.
- Poor web site security might give a means of access to information about individuals once individual details are made accessible on line.
- Staff may be tricked into giving away information, either about supporters or colleagues, especially over the phone, through “social engineering”.

Data recording and storage

LeisureChain Ltd will regularly review its procedures for ensuring that its records remain accurate and consistent and, in particular:

- ICT systems will be designed, where possible, to encourage and facilitate the entry of accurate data.
- Data on any individual will be held in as few places as necessary, and all staff will be discouraged from establishing unnecessary additional data sets.
- Effective procedures will be in place so that all relevant systems are updated when information about any individual changes.
- Member’s data held will require the permission of the member before the data becomes accessible to other members. Permissions will be obtained by way of tick boxes required to be completed by each member when they first join. These permissions may be withdrawn at any time by the member.

Data will be stored on site and will only be retained while it is required (ie for the duration of membership).

CCTV

LeisureChain Ltd has;

- installed a CCTV system which produces clear images which the law enforcement bodies can use to investigate crime and these can easily be taken from the system when required.
- sited cameras so that they provide clear images.
- positioned the cameras to avoid capturing images of persons not visiting the premises.
- sited monitors in a position that provides the staff with the security required whilst restricting as far as is practical the ability of the public to see them.
- placed visible signs showing that CCTV is in operation.
- a limited number of authorised persons that may access the recorded images from the CCTV system, which are securely stored. The recorded images are held for 28 days and with the exception of law enforcement bodies, images will not be provided to third parties.

the use of CCTV Woodside has been considered and it has been decided that it is required to prevent or detect crime, ascertain damage to property and to protect the safety and security of staff, members and visitors and that it will not be used for any other purpose and that the use will be reviewed.

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GDPR Adjustments

LeisureChain Ltd:

- holds information on members, visitors, staff and those signed up to the mailing list separately and does not send out blanket marketing materials.
- Ensures data held is adequate, relevant and limited to what is necessary for the running of the club and competitions.
- Endeavours to keep information up to date and where new information is provided (eg a change of address) the old information will be deleted.
- Will mail members annually to remind members to advise the club of any changes to their details.
- Keeps details of lapsed members for no longer than 3 months and only in case a member requests to be reactivated.
- Will record health information on buggy hire forms to ensure user safety. This will only be used in case of emergency to pass on the medical professionals and permission will be sort on first hiring the buggy and signing the form.
- Will keep some information for historical purposes (eg former captains names or a list of competitors from competitions) However, only names, results and handicaps will be retained. Other information such as addresses or contact details will be removed.
- Will hold members and staff details securely and only staff and volunteers who need the data will be given password access to the documents.
- Will brief staff and volunteers on the importance of keeping information private and destroying paper copies that are no longer required.
- Will provide data to third parties if it is a required legal obligation. For example a DBS check on volunteers.

Although permission is not required, the person needs to be informed of what is happening.

- Will provide data to third parties if it is required medical reasons. For example if an ambulance needs to be called for a staff member or customer, details will be provided to the medical professionals attending.
- Will notify the ICO without undue delay of security breaches related to personal data.

Policy review

The policy is to be reviewed on an annual basis or at such time that the Data Protection Act is amended.

Appendix i: Privacy statement

When you request information from Woodside Golf Club, sign up to any of our services or buy things from us, LeisureChain Ltd obtains information about you. This statement explains how we look after that information and what we do with it.

We have a legal duty under the Data Protection Act to prevent your information falling into the wrong hands. We must also ensure that the data we hold is accurate, adequate, relevant and not excessive.

Member's email address and/or telephone numbers may be given to other current members of the club for the purposes of facilitating activities pertaining to the club. Permission is sort on joining and can be withdrawn at anytime by the member.

Normally the only information we hold comes directly from you. Whenever we collect information from you, we will make it clear which information is required in order to provide you with the information, service or goods you need. You do not have to provide us with any additional information unless you choose to. We store your information securely on our computer system, we restrict access to those who have a need to know, and we train our staff in handling the information securely. Information is only kept for the length of your membership.

We will only contact you for marketing purposes if you have requested to join our e-mailing list , which will tell you of offers on the course and in the Brasserie. You have the right to be removed from the mailing list at any time after signing up. We will always aim to provide a clear method for you to opt out. You can also contact us directly at any time to tell us not to send you any future marketing material.

You have the right to a copy of all the information we hold about you (apart from a very few things which we may be obliged to withhold because they concern other people as well as you). To obtain a copy, write to the Directors at Woodside Golf Club. We aim to reply as promptly as we can and, in any case, within the legal maximum of one month.