

# *Thornton Golf Club*



## **Privacy Policy**

### **Introduction to our Privacy Policy**

This privacy policy details how we use and secure the information that we store about you. This policy applies to the information collected on our website in addition to the information we hold in the clubhouse and online regarding your membership or enquiry. We also operate a CCTV security system on which your image maybe recorded. It is important to us that the information we hold about you is accurate, up to date and is stored securely. Our Privacy Policy is periodically reviewed, and we retain the right to update it, this policy came into force on 24/05/2018 and complies with the 2018 GDPR European Legislation.

### **Who are we?**

We are Thornton Golf Club, a golf club located in Fife, Scotland and we act as a data collector and controller. Our address is:

Thornton Golf Club  
Station Road  
Thornton, Fife  
KY1 4DW

### **What do we need?**

When you register as a member of Thornton Golf Club or renew membership (including if you are registering or renewing on behalf of a child under the age of 18), or if you enquire about a visit to our club, we may ask you for the following personal information:

- Your name
- Your address
- Your date of birth
- Your contact details
- Your membership category
- Your occupation
- Your handicap
- Your scores in competitions

When you visit our website, we may collect the following personal data:

- IP Address
- Geographical Location
- Browser Type
- Length of Visit
- Number of Page Views

Thornton Golf Club will be a “controller” of the personal information that you provide us, unless otherwise stated. Thornton Golf Club has appointed George Hall as its primary data controller who will be responsible for overseeing, maintaining and securing the data we hold about you. In addition Scott Gillespie is the nominated data controller for CCTV recordings held by the Club.

### **How Do We Collect Information About You?**

The information we collect from you is collected through: membership application forms, online enquiries, CCTV recording, competition entry sheets, scorecards and any other forms of contact you make with us.

### **Uses of Personal Data**

Personal data submitted to us will be used for purposes outlined in this policy. We may use your information to:

- Operate the club and provide you with core member services including: booking, event management, insurance, licensing, PVG checks and other services operated by the club
- For internal record keeping
- Set up and administer your online accounts on our website and tee booking system
- Send you up to date information regarding the course, club news, incentives and other relevant information
- Administration of the club’s website
- (Provided you give consent) to send you promotional emails about special offers or other membership benefits you may find interesting. These emails may be sent from the Golf Club or Scott Gillespie Golf directly (please note, you can opt out of these emails at any time)

If you do not provide us with all of the personal information that we need to collect, this may affect our ability to offer you the outlined membership services and benefits.

All of the personal data we hold is viewed, maintained and held within the UK. Only golf club employees, club administrators, key executive committee members and employees of Scott Gillespie Golf have the right to access or alter your data.

If you have any questions or rejections to the above uses of personal information, please contact [enquiries@thorntongolfclub.co.uk](mailto:enquiries@thorntongolfclub.co.uk) with any concerns/queries.

### **How long do we hold data for?**

We only retain your information as long as it is required, and you have the right to request complete erasure of the data we hold about you. As a general rule, we retain data for 5 years. In the case of CCTV recordings these are securely held for a period of up to six months, except where they may be required under legal or criminal enquiries.

### **Sharing Information**

We may be required to share personal information with statutory or regulatory authorities and organisations to comply with statutory obligations. By submitting your information to us, in written, oral or digital format, you agree to it being shared to the following bodies for the detailed purposes:

- Our club professional’s business, Scott Gillespie Golf, for administrative purposes

- Where it is necessary, to share this information with a service provider, such as GolfNow (the organisation which owns and manages the BRS system), in order to provide Golfers with services they have requested, such as booking tee times, customer support and marketing
- Howdidido.co.uk, for the purposes of competition scoring and handicap maintenance
- Scottish Golf Union/CONGU
- Disclosure Scotland and Police Scotland for the purposes of safeguarding children

Once your data has been passed on to the above organisations, the data is of their responsibility and is subject to the relative privacy policies. In the event of any legal proceedings or other similar events, we would seek to pass on your information to the relevant body.

### **Securing Data**

We take reasonable precautions to prevent your data from being accessed by anyone other than those individuals or organisations outlined in this policy. We store all paper-based information in a secure fashion and dispose of it in a confidential manner. Any electronic information provided is held securely on our servers, all of which are password protected and have the relative security certifications. Although we cannot guarantee complete security of your information, please be assured that we take all reasonable and appropriate steps to minimise any chance of this data being misused.

### **Your Rights**

This privacy policy ensures you have the relative rights, which are outlined by the GDPR regulations.

If at any point you believe the information we hold about you is incorrect you can request to see this information, and have it corrected or deleted. If you wish to raise a complaint on how we have handled your personal data, you can contact us.

If you are not satisfied with our response or believe we are processing your data not in accordance with the law, you can file a complaint with the Information Commissioner's Office (ICO).

If you have any questions regarding our privacy policy, please contact us on (01592) 771111 or email us at: [enquiries@thorntongolfclub.co.uk](mailto:enquiries@thorntongolfclub.co.uk).