



DATA PROTECTION POLICY FOR PENWORTHAM GOLF CLUB LTD

This policy applies to:

- Penwortham Golf Club Ltd
- all sites under the control of Penwortham Golf Club Ltd
- all staff operating on behalf of Penwortham Golf Club Ltd
- it applies to paid staff and volunteers

Policy operational date:

- With effect from 21 May 2018
- Policy prepared by: H Moorby and R Mullineux
- Data Protection Officer – The Club Manager
- Date approved Management: 21 May 2018
- Policy review date: 21 May 2021

Introduction

The purpose of this policy is to enable Penwortham Golf Club Ltd to:

- comply with the law in respect of the data it holds about individuals
- follow good practice:
- protect Penwortham Golf Club 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

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

Penwortham Golf Club Ltd will:

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

Penwortham Golf Club 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, eg given out to general public

Responsibilities

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

The Data Protection Officer is currently The Club Manager, with the following responsibilities:

- Briefing the Board on Data Protection responsibilities
- Reviewing Data Protection and related policies
- Advising other staff on Data Protection issues
- Ensuring that Data Protection induction and training takes place
- Notification
- Handling subject access requests
- Approving unusual or controversial disclosures of personal data

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

Significant breaches of this policy will be handled under Penwortham Golf Club 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.

Penwortham Golf Club Ltd has identified the following risks:

- Staff or volunteers with access to personal information could misuse it
- Poor website 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 telephone
- through 'social engineering'
- Setting security levels Access to information on the main computer system will be controlled in accordance with our E-security procedure

Data Recording and Storage

Penwortham Golf Club 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 on website 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 log on. These permissions may be withdrawn at any time by the member

Data will be stored on site or any other site owned or in the control of Penwortham Golf Club Ltd will retain data for a minimum period of six years

Archived paper records of members are stored on site or any other site owned or in the control of Penwortham Golf Club Ltd.

CCTV

Penwortham Golf Club 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 8 days and with the exception of law enforcement bodies, images will not be provided to third parties

Policy Review

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

Privacy Statement

When you request information from Penwortham Golf Club Ltd, sign up to any of our services or buy things from us, Penwortham Golf Club 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, where the information is not currently available on the members directory via the club website.

Normally the only information we hold comes directly from you, incorporating your consent for us to utilise this information. 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.

We may also like to contact you in future to tell you about other services we provide. You have the right to ask us not to contact you in this way. 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, either e-mail us on admin@penworthamgc.co.uk, or write to the Data Protection Officer at Penwortham Golf Club Ltd. There is a charge of £10 for a copy of your data (as permitted by law). We aim to reply as promptly as we can and, in any case, within the legal maximum of 30 days. We also want to make sure that your personal information is accurate and up to date so you may ask us to correct or erase information that you think is inaccurate.

Approved by the Management Committee May 2018