



HARBURN GOLF CLUB

Harburn, West Calder, EH55 8RS

Phone: 01506 871131, email: info@harburngolfclub.co.uk

Introduction

We know that providing personal information is an act of trust and we take that seriously.

This Privacy Policy should help you work out what we collect your data for and how we protect it for you. If you have any questions about it, please email info@harburngolfclub.co.uk

We go into more detail later on this page, but here's the short and sweet version:

In a nutshell

Most of the data we collect and hold about you is for the purpose of providing you with members communication.

To supply you with information about Harburn Golf Club

We gather information about you so we can accurately supply you with information about membership, membership fees, competitions and competition results, events being held by the club and for informing you perhaps when the course needs to be closed.

If you are a visitor or guest of the club, we will contact you with information about visitor fees or for example Open Competitions that we believe might interest you.

For example, we may need to know your postal address if you prefer posted mail to email by way of communication.

Where necessary, we may need to share this with other organisations within the golfing fraternity such as How Did I Do or Golf Scotland, but we will NEVER make your contact information generally available to third parties purely for their marketing purposes.

To make Harburn better

We may collect data on how you use our website, the Harburn App and other features. We have the ability to track things like where you click on our site and what features you use. This lets us learn what's working well and what features we need to improve.

We sometimes share this data in an aggregated form with agencies or partners that are helping us. For example, we might tell our website hosting company how many website visits we get in a given period.

To advertise Harburn

We use your data to help grow Harburn as a club and to ensure the membership remains engaged.

We also share aggregated data with golfing agencies that help us with advertising. For example, we might share with a golfing agency such as Golf Now how many of our members play competitive golf or casual golf.

To communicate with you

In addition to sending you key information about your membership by email, from time to time we'll also send you information about competitions or events we think will interest you.

Where necessary, we may need to share your data with organisations that send communications on our behalf. For example, Golf Scotland or Linlithgowshire Golf Association.

Information that we collect

Information you provide us at sign-up

- Contact information: such as your name, address, email address, date of birth and telephone number.
- Vulnerability information: such as disabilities, age, or health conditions for you or a member of your household. This helps us provide suitable additional services.
- Financial information: We need your bank details if you want to pay by direct debit.

Information while we provide you services

- Customer service data: when you get in touch by phone, email, chat or community posts we may hold a copy and review those communications so we can provide the best possible service to you and all our members and so we can show evidence of transactions or events.
- Data about your interactions with us: such as information about how you communicate with us (by phone, emails, or chat) and how you use our website and App.
- Technical data: such as IP addresses (including the general information in such address, such as city, county and postcode), login details and other information about your mobile devices, browser types and browser language.

We also may use the information we hold about you for the following purposes:

Performing our membership contract with you

We need to process information in order to supply you with the member services you've asked for under our contract. For example, we may use your competition results to keep your golf handicap up to date which allows us to issue you with a handicap certificate if you decide to play as a visitor at another course.

Fulfilling our legal and regulatory obligations

Many of the ways we manage your membership are based on requirements and obligations we have to you as a member of Harburn Golf Club. We may also need to comply with court orders, and disclose information to law enforcement agencies if requested.

Priority Services Register with your consent

If you have let us know that you (or a member of your household who might visit the club) need extra care or have any vulnerabilities, we will ask for your explicit consent before we add your details to any Priority Service Register we may operate from time to time. This helps us take steps to ensure your safety.

For our legitimate business interests

This means that using your information is necessary for us to build the business of Harburn Golf Club and provide our services to you. We consider and balance any potential impact on you and your rights before we process your personal data for our legitimate interests. Our legitimate interests include:

- Maintaining and improving our services: for example, we may use your information that we obtain through your emails and calls to train our staff. We may also use your information to ensure that our services are working as intended – for example, understanding which parts of the website are easiest to use.
- We may also contact you for suggestions on how we can improve the way we provide our services to you.
- Providing personalised services, including suggested payment amounts:
- Communicating with you about our services: we may contact you about Harburn news, updates and new products or services that we think you might be interested in. We may also contact you to provide you with offers, competitions, marketing materials and other promotional materials, both online and through other marketing channels, such as third party social networks, like Facebook.
- Measuring our performance and developing new services: for example, we may use data for measurement to understand how our services are used. We may also use aggregated data to understand our members and their golf habits better.
- Helping to prevent and detect fraud or debt: we also need to be able to detect and prevent fraud and recover unpaid bills.

If you have questions about the lawful basis on which we collect and use your information, you can email our Members Secretary at info@harburngolfclub.co.uk

Sharing your information

When we share your information

We sometimes need to allow our service providers (such as banks for direct debits) to process personal information we hold about you on our behalf for the reasons set out in this Policy or as otherwise required by law.

We will endeavour make sure that these third parties won't use your personal data for their own purposes and we only permit them to use it in accordance with our instructions and

the law. This includes the following types of organisations:

- Trusted businesses or persons: who process your information for us for the purposes set out above, based on our instructions and as set out in our Privacy Policy and any other appropriate confidentiality and security measures. For example, we use service providers to help us with member support or payment processing.
- Marketing agencies, search engines and social media networks: to advertise Harburn and to gather feedback on Harburn such as through customer surveys.
- People you have authorised us to share data with: such as family members or solicitors, so we can fulfil your requirements.
- People you are referring to Harburn: if you refer a new member to us, we may share your first name and aggregated data about you with the referred person.

When you share your own information

Sometimes you may share your information publicly, such as by posting on our members page or on social media sites. Remember, when you share information publicly it may become accessible through search engines.

Sending your data outside the European Economic Area

We do not anticipate any situation whereby we believe we'll need to share your information with any third party which may be based outside the European Economic Area.

If we have to do this, we will ensure that any information will be protected in line with this Privacy Policy.

You're in control

Your rights

If we collect or handle your personal data, you have rights as an individual which you can exercise in relation to the information we hold about you:

- To correct or update your personal information, you can write to the Members Secretary at info@harburngolfclub.co.uk
- To delete your personal information, you can email us at info@harburngolfclub.co.uk We will delete any information that we no longer need to hold, but we won't always be required to do this.
- To ask us to restrict processing of your personal information or transfer your personal information to a different organisation, you can email us at info@harburngolfclub.co.uk
- To confirm if we are using your personal information or get access to all your personal information that we hold, in an easy to understand, portable and secure format, you can email us at info@harburngolfclub.co.uk with the subject line "Subject Access Request".
- To object to the processing of your personal information, you can email us at info@harburngolfclub.co.uk
- To withdraw consent to process your data, you can email us at info@harburngolfclub.co.uk at any time.

- To opt-out of marketing communications you can email us at info@harburngolfclub.co.uk

Once we receive a request from you, we will respond within at most 1 month, but usually a lot quicker. Before actioning these requests, we will need to positively identify you.

If you're unhappy with how we've handled or processed your personal information - or you want further information about your rights - you have the right to contact the [Information Commissioner's Office](#), the supervisory body that regulates handling of personal information in the UK.

Keeping your information secure

Whilst we cannot ensure or guarantee that unauthorised access to or unauthorised alteration, disclosure or loss of information will never occur, we work hard to prevent it. In particular:

- Your membership information is protected for your privacy and security. Either this is through a password you have chosen or a password on our server in the club office. You can for example log-in to your BRS account directly with your email address and your password. Harburn employees will never ask for your password.
- To help keep your account and your personal information secure you should not disclose your password details to anyone. We recommend you change your passwords from time to time.
- We review our practices for collecting, processing and storing personal information, including physical security measures, to guard against unauthorised access to systems and backups to prevent the loss of information. We will continue to enhance our security procedures as new technology becomes available.
- We restrict access to personal information wherever possible to people who need to know that information to process it and who are subject to contractual confidentiality requirements.

Retaining and holding your information

We keep the personal information we collect for no longer than is necessary for the purposes for which we collected it.

The length of time depends on the purposes for which we use it, or otherwise to meet our legal obligations.

We will delete any information as soon as we no longer have a valid reason to hold it. If this is not possible (for example, because your personal information has been stored in backup archives), then we will securely store your personal information and isolate it from any further processing until deletion is possible.

Contact us

You can get in touch about anything in this Policy by emailing us and our Members Secretary at info@harburngolfclub.co.uk

About this Policy

When this Policy applies:

For the purposes of this Policy, "we", "us", "our" and Harburn means Harburn Golf Club, Harburn Golf Club is the Data Controller for your personal data.

This Policy applies to how we use your information in relation to our products and services generally.

This Policy doesn't apply to other companies' sites that you get to through our website or social media pages. So make sure you've read their policy before putting your personal information on their site.

Changes to this Policy:

We may change this Policy at any time. If we make any changes, we'll post them on this page. If they're substantive changes, we'll also have a more prominent notice letting you know. You can also email or write to us for a physical copy.

Your continued use of our services will mean that you accept and agree to any changes to the Privacy Policy.

Last updated: The Policy was last updated on 23 May 2018