

THE BERKSHIRE GOLF CLUB PRIVACY NOTICE

The Berkshire Golf Club respects your privacy and is committed to protecting your personal data. This privacy notice (the "Notice") will inform you as to how we look after your personal data when you engage with our club, including through your use of our website located at www.theberkshire.co.uk (the "Website") and tell you about your privacy rights and how the law protects you.

This Notice aims to give you information about how The Berkshire Golf Club collects and processes your personal data, (including any data you may provide through this Website) and when you otherwise communicate with us. This could be as part of your membership or nomination for membership, when you book a visit or visit our premises.

It is important that you read this Notice so that you are fully aware of how and why we are using your personal data.

Amendments and updates to this Notice may be made from time to time. Any revisions will be posted on this page so you will always be aware of what information we collect and how we use that information. Please review this page regularly so that you are aware of any changes.

1. IMPORTANT INFORMATION AND WHO WE ARE

The Berkshire Golf Club is the controller and responsible for your personal data (referred to as the "Club", "we", "us" or "our" in this Notice).

We have appointed a Data Privacy Manager who is responsible for overseeing questions in relation to this Notice. If you have any questions about this Notice, including any requests to exercise your legal rights, please contact the Data Privacy Manager using the details set out below.

Our full details are: The Berkshire Golf Club Ltd

Data Privacy Manager: Michael Newland

Email address: michael@theberkshire.co.uk

Postal address: The Berkshire Golf Club, Swinley Road, Ascot, SL5 8AY

The Club is registered with the UK Information Commissioners Office ZA381858.

Changes to your information

It is important that the information we hold about you is accurate and current. If you are a member, we will contact you annually to ask you to confirm whether any of your information has changed. However, please keep us informed if your information (e.g. name or address) changes during your relationship with us.

2. INFORMATION WE COLLECT ABOUT YOU

"*Personal data*" (also referred to in this Notice as "*information*") means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

Information you provide

We may collect data relating to you that you provide when you:

- become a member or as part of the nomination process to become a member
- fill in a form at the Club
- correspond with us by post, phone, email or otherwise
- use our facilities;
- arrange a game;
- book a golf buggy;
- make a reservation, take part in a social event or other activities at the Club;
- create an account on our Website and/or App;
- subscribe to our services;
- request marketing communications to be sent to you;
- enter or take part in a tournament, competition, promotion or survey;
- apply for a job with us; or
- give us feedback.

We may collect, use, store and transfer different kinds of personal data about you during the above listed interactions including your first name, maiden name, last name, image, username or similar identifier, marital status, title, date of birth, gender, billing address, home address, email address, telephone numbers, bank account and payment card details, details about payments to and from you and other details of products and services you have purchased from us, CV and employment details, insurance details, driving licence and other identification information, previous golf club or school, handicap, doctors details, preferences, interests, purchases or orders.

We may collect certain **sensitive personal data** about you (also known as special categories of personal data) about you. This includes details about any medical condition and/or disability. We only hold this personal data when you provide it to us and will only use it for the purposes for which it has been provided to us, namely for your wellbeing. We may also process sensitive personal data where processing is necessary for the establishment, exercise or defence of legal claims.

Information we collect about you

As you interact with our Website, we may automatically collect information about your visit, equipment, browsing actions and patterns. This may include:

- the internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this Website.

Information we collect from other sources

We may receive personal data about you from an individual who has nominated you as a candidate for membership at the Club or a referee where you are applying for a job with us. This may include your name, address, date of birth, email address, telephone number, job title, and employer details.

Children

For children who are members of our Club we will hold certain information relating to them such as name, address, telephone number, date of birth, handicap, school and contact details of their parent/guardian. We may also hold sensitive personal data about them such as details of any medical conditions. We will hold this sensitive personal data when it has been provided to use and will only use it for the purposes for which it has

been provided to us, namely for the child’s wellbeing and to comply with any legal obligations that we may have.

If you fail to provide personal data

Where we need to collect personal data by law, for the purposes of a contract we have or are trying to enter into with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to allow you to use our facilities or make a booking).

3. HOW WE USE YOUR PERSONAL DATA

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- When you give your consent;
- Where we need to perform the contract we are about to enter into or have entered into with you;
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests; or
- Where we need to comply with a legal or regulatory obligation.

Purposes for which we will use your personal data

We have set out below, a description of the purposes for which we may use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Purpose/Activity	Lawful basis for processing including basis of legitimate interest
As part of the nomination process for membership and/or to register you as a new member	Performance of a contract with you Necessary for our legitimate interests (for use in connection with future membership)
To allow you to enter our premises and to use our facilities	Performance of a contract with you Necessary for our legitimate interests (for security purposes and so that we are aware of who is on our premises and using our facilities) To comply with a legal or regulatory obligation
To allow members to access the Website and online diary calendar	Necessary for our legitimate interests (to allow members to view availability and arrange matches)
To allow members to access The Berkshire Golf Club App in order to view the online diary and course conditions	Consent
To produce the Club membership book, a copy of which is available for collection by all members	Necessary for our legitimate interests (to enable members to contact each other to organise fixtures)

To enable members/non-member to arrange games and to enter competitions.	Performance of a contract with you Necessary for our legitimate interests (for running our business and enabling members and non-members to compete)
Membership and Subscription renewals	Performance of a contract with you
To administer and protect our business and this Website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) Necessary to comply with a legal obligation
To deliver relevant Website content	Necessary for our legitimate interests (to study how members and visitors use our products/services, to develop them, to improve our Club and to inform our marketing strategy)
To use data analytics to improve our Website, products/services, marketing, customer relationships and experiences	Necessary for our legitimate interests (to define types of customers for our products and services, to keep our Website updated and relevant, to develop our Club and to inform our marketing strategy)
For marketing and business development including the sending of newsletters and other marketing communications	Necessary for our legitimate interests (for running our business, to develop our Club, improve facilities and inform our marketing strategy)
To make suggestions and recommendations to you about goods or services that may be of interest to you	Necessary for our legitimate interests (to develop our products/services and grow our Club)
For health and safety purposes	Necessary to comply with a legal obligation The lawful basis for processing any special category data is the processing is necessary for the establishment, exercise or defence of legal claims as well as explicit consent and processing is necessary to protect the vital interests of the data subject or another natural person
For security purposes we use CCTV around our premises	Necessary for our legitimate interests (for security purposes to ensure a safe environment for our staff, members and visitors and for the prevention and detection of crime)
Recruitment activities and to process your application for employment at the Club	Necessary for our legitimate interests (to carry out recruitment activities) Performance of a contract or to take steps at your request before entering a contract. The lawful basis for processing any information that you provide as part of your application which is special category data (e.g. health, religious or ethnic information) is that processing is necessary for

	carrying out our obligations in employment and for the safeguarding of your fundamental rights and interests as well as assessing your working capacity as an employee
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Some of the legal bases relied on for processing will overlap and there may be several bases which justify our use of your personal information.

Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact michael@theberkshire.co.uk.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

4. DISCLOSURES OF YOUR PERSONAL DATA

We will not sell your personal data and don't generally give your personal data to third parties but there are some exceptions as we have set out below.

We may share your information in the following ways:

- with other members of our Club in order to allow individuals to arrange games between themselves, subject always to their rights contained in this Notice;
- with providers of our IT systems, Website and App and other partners, suppliers or third parties we do business with;
- with other golf clubs for the purposes of a competition or other event;
- with any actual or prospective seller or buyer of our Club and/or any assets. Information held by us about our customers and any users will be one of the transferred assets;
- in order to comply with any legal obligation or as otherwise permitted by law;
- for debt collection purposes;
- for security purposes or to protect our rights or those of a third party;
- in the conduct or defence of legal claims or in order to enforce our terms and conditions;
- with our legal and professional advisers; and
- for the purposes of the prevention or detection of offences, and/or the apprehension or prosecution of offenders, we may share any information that we collect with the Police, other public or private sector agencies, governmental or representative bodies in accordance with the relevant legislation. This will include public authorities, insurance companies, finance companies and/or other agencies.

We do not transfer your personal data outside the European Economic Area (**EEA**).

5. DATA SECURITY

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to

know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

6. MARKETING

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising.

You will receive marketing communications from us if you have used our facilities or if you are a member of our Club or have been nominated to become a member of our Club or purchased goods or services from us and, in each case, you have not opted-out of receiving that marketing. We will ensure that any marketing communications we send to you are relevant and we will only send marketing communications to you where we are lawfully able to do so under data protection laws and laws relating to direct marketing.

We will get your express opt-in consent before we share your personal data with any company outside the Club for marketing purposes.

Opting-out

You can ask us to stop sending you marketing communications at any time by contacting us at michael@theberkshire.co.uk.

Where you opt-out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a product or service purchase, warranty registration, product or service experience or other transactions.

7. DATA RETENTION

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements. For members of the Club we will retain your personal data for the duration of your membership and for two years after your membership has terminated. For further information regarding our retention periods please contact us at michael@theberkshire.co.uk.

8. WHERE WE STORE YOUR INFORMATION

Personal data that you provide to our Club is stored on secure servers operated by third parties and physical files are stored in locked cabinets accessible to staff of the Club only. The members' book is only printed on request and is provided to members of the Club only. Any copies are held in a locked cabinet.

We take reasonable steps to ensure that any third parties hosting the Website have adequate security measures in place to protect your personal data.

As a member you will have a username and password to access the members only area of our Website. You are responsible for keeping these details confidential and you must not disclose them to any third party.

9. YOUR LEGAL RIGHTS

You have the right to:

- **Right of access** – a right to request access to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it. You will not have to pay a fee to access your personal data (or to exercise any of the other rights listed below). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in such circumstances;
- **Right of rectification** – a right to request correction of the personal data that we hold about you;
- **Right of erasure**– in certain circumstances, a right to request erasure of your personal data;
- **Right to object** – in certain circumstances, a right to object to processing of your personal data. You have an absolute right to object where we are processing your personal data for direct marketing purposes;
- **Right of Restriction** – in certain circumstances, a right to request restriction of the processing of your personal data;
- **Right of Portability** – in certain circumstances, a right to request the transfer of your personal data to you or to a third party;
- **Right to withdraw consent** – a right to withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent.

If you wish to exercise any of the rights set out above, please contact michael@theberkshire.co.uk.

You also have a right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues. We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

10. COOKIES

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this Website may become inaccessible or not function properly. For more information about the cookies we use, please see our separate Cookie Policy here www.theberkshire.co.uk/cookies.

11. THIRD-PARTY LINKS

The Website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these

third-party websites and are not responsible for their privacy statements. When you leave our Website, we encourage you to read the privacy notice of every website you visit.