



## VISITOR PRIVACY NOTICE

This is privacy notice of The Nairn Golf Club

Here at The Nairn Golf Club, we want to ensure that any personal information we have collected about you, is safe and secure.

The purpose of this privacy notice is to inform you as to how we look after your personal data when you visit our website (regardless of where you visit it from). We'll also tell you about your privacy rights and how the data protection law protects you.

### 1. WHO WE ARE AND IMPORTANT INFORMATION

#### **What is the purpose of this privacy notice?**

This privacy notice aims to give you information on how we collect and process your personal data including any data you may provide through the purchase of a product or service/take part in a competition.

You must read this privacy notice together with any other privacy notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data.

#### **Data Controller(s)**

The Nairn Golf Club is the controller and responsible for your personal data (collectively referred to as "we", "us" or "our" in this privacy notice). Our contact details are The Nairn Golf Club, Seabank Road, Nairn, IV12 4HB. For all data matters contact Peter Bavidge, Quality Assurance Officer on [QA@nairngolfclub.co.uk](mailto:QA@nairngolfclub.co.uk).

#### **Third-party links outside of our control**

Our 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.

### 2. THE PERSONAL DATA WE COLLECT ABOUT YOU

Personal data, or personal information, means any information about an individual from which that person can be identified. You can find out more about personal data from the [Information Commissioners Office](#).

We may collect, use, store and transfer different kinds of personal data about you. Depending on the type of booking you make with us, you may initially provide us with or we may obtain personal information about you, such as information regarding your:

- Personal contact details that allow us to contact you directly such as name, title, address, email address and telephone numbers

- Gender

- Records of your interactions with us such as telephone conversations, emails and other correspondence and your instructions to us

- Any credit/debit card and other payment details you provide in order for us to receive payments

- Records of your attendance at events hosted by us

- Images in video and/or photographic form and voice recordings

- Your marketing preferences so that we know whether and how we should contact you

- Records and assessment of any player rankings, grading or rating, competition results, details regarding events and matches attended and performance



We do not collect any **Special Categories of Personal Data** about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

**If you fail to provide personal data**

For some of your personal information you will have a legal, contractual or other requirement or obligation for you to provide us with your personal information. Where we need to collect your personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, if you do not provide us with the requested personal information, we may not be able to admit you as a visitor or we may not be able to properly perform our contract with you or comply with legal obligation and we may have to cancel any booking(s) you have made with us. For other personal information you may not be under any obligation to provide it to us, but if you do not provide it then we may not be able to properly perform our contract with you.

**3. HOW WE COLLECT YOUR PERSONAL DATA**

We typically collect personal information about our visitors when you contact us to make a booking, make a booking online, complete entry forms for competitions at the Club, when you make a query and/or complaint or when you correspond with us by phone, email or in some other way.

If you are providing us with more than one point of contact for your booking, they also have a right to know and to be aware of what personal information we hold, how we collect it and how we use and may share that information. Please share this privacy notice with those of whom you feel are sufficiently mature to understand it. They also have the same rights as set out in the ‘Your rights in relation to personal information’ section below.

**4. 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:

The table below describes the main purposes for which we process your personal information, the categories of your information involved and our lawful basis for being able to do this.

<b>Purpose</b>	<b>Personal information used</b>	<b>Lawful basis</b>
To administer any bookings, you have with us and manage our relationship with you, including dealing with payments and any support, service or enquiries made by you.	All contact and booking details, transaction and payment information, records or your interactions with us and marketing preferences	This is necessary to enable us to properly manage and administer your booking with us
To arrange and manage any contracts for the provision of any services or products	All contact and booking details, transaction and payment information, records or your interactions with us	This is necessary to enable us to properly administer and perform any contract for the provision of any services and products you have purchased from us



To send you marketing information we think you might find useful or which you have requested from us, including newsletters, information regarding special offers and events	Contact details and marketing preferences	Where you have given us your consent to do so
To answer your queries or complaints	Contact details and records of your interactions with us	We have a legitimate interest to provide complaint handling service to you in case there are any issues with your booking and/or visit.
Retention of records	All the personal information we collect	We have a legitimate interest in retaining records whilst they may be required in relation to complaints or claims. We need to retain records in order to properly administer and manage your booking/visit and run our Club. In some cases, we may have a legal or regulatory obligation to retain records
The security of our IT systems	Your usage of our IT systems and online portals	We have a legitimate interest to ensure that our IT systems are secure
To conduct data analytics studies to better understand event attendance and trends within golf	Records of your attendance at any events or competitions hosted by us	We have a legitimate interest in doing so to ensure that our visitors are targeted and relevant
For the purposes of promoting our club, our events and visitor packages	Images in video and/or photographic form	Where you have given us your express consent to do so

Where you have given us your consent to use your personal information in a particular manner, you have the right to withdraw this consent at any time, which you may do so by contacting us as described in the 'Contacting us' section below.

Please note however that the withdrawal of your consent will not affect any use of the data made before you withdrew your consent and we may still be entitled to hold and process the relevant personal information to the extent that we are entitled to do so on bases other than your consent. Withdrawing consent may also have the same effects as not providing the information in the first place, for example we may no longer be able to provide certain benefits to you.

**Performance of Contract** this means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

**Legitimate Interest** this means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting Peter Bavidge, Quality Assurance Officer.

**Comply with a legal or regulatory obligation** this means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.



Generally, we do not rely on consent as a legal basis for processing your personal data other than in relation to sending third party direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by contacting us.

### **Marketing**

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

Email, post and SMS marketing: from time to time, we may contact you by email, post or SMS with information about products and services we believe may be of interest to you.

We will only send marketing messages to you in accordance with the marketing preferences you set. You can then let us know at any time that you do not wish to receive marketing messages by contacting us. You can also unsubscribe from our marketing by clicking on the unsubscribe link in the marketing messages we send to you.

### **Third-party marketing**

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

### **Opting out**

You can ask us or third parties to stop sending you marketing messages by following the opt-out links on any marketing message sent to you **or** by emailing [Membersecretary@nairngolfclub.co.uk](mailto:Membersecretary@nairngolfclub.co.uk) at any time.

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/service purchase, product or service experience or other transactions.

## **5. WHO WE SHARE YOUR PERSONAL DATA WITH**

We do not sell, trade or rent your personal information to others. We may have to share your personal data with the parties set out below for the purposes set out in the table in paragraph 4 above.

We share personal information with the following third parties:

To any governing bodies or regional bodies for the sports covered by our Club, to allow them to administer the sport at local, regional and national levels.

Service providers, e.g. payment processors and IT services

The Government or our regulators, where we are required to do so by law.

Police, Law enforcement and Security Services, to assist with the investigation and prevention of crime and the protection of security.

## **6. INTERNATIONAL TRANSFERS**

WE DO NOT TRANSFER YOUR PERSONAL DATA OUTSIDE THE EUROPEAN ECONOMIC AREA (EEA).

## **7. 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 and other third parties who have a 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.

## 8. 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.

By law we have to keep basic information about our customers (including contact, identity, financial and transaction data) for [six] years after they cease being customers for [tax] purposes.]

In some circumstances you can ask us to delete your data: see **Your legal rights** below for further information. In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

Generally, where there is no legal requirement, we retain all physical and electronic records for a period of 3 years after your last contact with us.

Exceptions to this rule are:

- CCTV records which are held for no more than 30 days unless we need to preserve the records for a purpose of prevention and detection of crime
- Information that may be relevant to personal injury or discrimination claims may be retained until the limitation period for those types of claim has expired. For personal injury or discrimination claims this can be an extended period as the limitation period might not start to run until a long time after the event.

It is important to ensure that the personal information we hold about you is accurate and up-to date, and you should let us know if anything changes, for example if you change your email address or contact telephone number. You can update this information by contacting us using the details set out in the 'contacting us' section below.

## 9. YOUR LEGAL RIGHTS

Unless subject to an exemption under the data protection laws, you have the following rights with respect to your personal data:

- The right to request a copy of the personal data which we hold about you
- The right to be informed about how your personal information is being used
- The right to request that we correct any personal data if it is found to be inaccurate or out of date
- The right to request your personal data is erased where it is no longer necessary to retain such data
- The right to withdraw your consent to the processing at any time, where consent was the lawful basis for processing your data
- The right, where there is a dispute in relation to the accuracy or processing of your personal data, to request a restriction is placed on further processing
- The right to object to our processing of personal data, where applicable i.e. where processing is based on our legitimate interests (or in performance of a task in the public interest/exercise of official authority); direct marketing or processing for the purposes of scientific/historical research and statistics)

Your right to withdraw consent or object to processing for direct marketing purposes are absolute rights.



Whilst this privacy notice sets out a general summary of your legal rights in respect of personal information, this is a very complex area of law. More information about your legal rights can be found on the Information Commissioner's website at <https://ico.org.uk/for-the-public/>.

To exercise any of the above rights, or if you have any questions relating to your rights, please contact us by using the details set out in the 'Contacting us' section below.

If you are unhappy with the way we are using your personal information you can also complain to the UK Information Commissioner's Office or your local data protection regulator. We are here to help and encourage you to contact us to resolve your complaint first.

If you wish to exercise any of the rights set out above, please contact Peter Bavidge, Quality Assurance Officer on [QA@nairngolfclub.co.uk](mailto:QA@nairngolfclub.co.uk)

### **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 in a timely manner. 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. CHANGES TO THIS NOTICE AND YOUR DUTY TO INFORM US OF CHANGES**

Please keep us informed if your personal data changes during your relationship with us. It is important that the personal data we hold about you is accurate and current. We reserve the right to update this privacy notice at any time, and we will provide you with a new privacy notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information. When we change this notice in a material way, we will update the version at the bottom of this page. For significant changes to this notice we will try to give you reasonable notice unless we are prevented from doing so. Where required by law we will seek your consent to changes in the way we use your personal information.

## **11. CONTACTING US**

To exercise all relevant rights, queries or complaints in relation to this policy or any other data protection matter between you and us, please in the first instance contact our Peter Bavidge, Quality Assurance Officer on [QA@nairngolfclub.co.uk](mailto:QA@nairngolfclub.co.uk).