



NATIONAL ASSOCIATION OF PUBLIC AND PROPRIETARY GOLF CLUBS AND COURSES (NAPGC)

NAPGC Data Protection Policy

Data protection regulations changed with the introduction of the GDPR ON 25 May 2018.

To enable the NAPGC to function correctly we need to be able to communicate with our Clubs, Officials, Team Managers, Players and Parents.

We are required by GDRP legislation to obtain permission from you to communicate with you by using the data we hold. Permission to hold your personal data is required through opting in.

We need to hold certain information in order to manage the organisation and run competitions.

The information held can include personal data and Club details such as the following.

Personal Details:

- Your Name
- Address
- Email Address
- Telephone Numbers
- Date of Birth
- Gender
- Handicap details (indexes and WHS numbers)
- **We do not hold bank account details.**

Club Details:

- Club Names
- Club addresses
- Weblinks
- Club contact details (which can incorporate the above)

How we get personal information:

- Most of the personal information we process is provided to us directly by you.
- We can also receive personal information indirectly, from Golf Genius, England Golf or your club officials.

Under GDPR the lawful basis we rely on for holding and using your personal information are:

- Your consent:
 - You or your club will have given this when registering as a contact or signing up for various events. You can remove your consent at any time. You can do this by contacting secretary@napgc.org.uk



- Our legitimate interest:
 - We need the details in order to manage and run the organisation. Providing information to clubs and contacts on administrative matters and providing information to club contacts and individuals on the range of competitions offered, associated details and in the management of entries to competitions.

How we store and retain your personal information

- Your information is securely stored. Depending on purpose it is held within the club membership records, accounts system and/or competition databases including golf genius. Club bank account details where supplied are also securely held within the bank account facility.
- We keep your personal information for as long as you are an affiliated NAPGC club, a member of an affiliated club or are involved in a competition. If you cease to fall under the above categories, then as soon as possible after we become aware, we will dispose of your information by deleting your personal information from our records.

We use the data provided as follows:

- The data we hold regarding you as individuals and your Club is needed to manage engagement and run competitions. This is held with the records of the NAPGC and the database systems we use.
- Player names, results and handicaps along with pictures are also published on the internet, golf platforms and our website as part of competition entry, start sheets and results publication.
- Email addresses are used to send Club lead contacts and members information about management of the organisation and competitions run by NAPGC and England Golf. Phone numbers are also used to supplement contact where needed, including by way of messaging and other forums (such as what's app).
- Periodic newsletters and other competition information is also issued to Clubs and or members.
- Information provided directly by individual members are similarly managed.
- These processes and systems are used to enable the smooth running of the organisation.
- We may share information we hold with England Golf for golfing purposes.

Retention of Data:

- Data is periodically reviewed and deleted after 3 years if no longer being used.
- Personal data will be deleted sooner than 3 years if requested by individuals.



Your data protection rights

Under data protection law, you have rights including the following:

- **Your right of access** - You have the right to ask us for copies of your personal information.
- **Your right to rectification** - You have the right to ask us to rectify personal information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.
- **Your right to erasure** - You have the right to ask us to erase your personal information in certain circumstances.
- **Your right to restriction of processing** - You have the right to ask us to restrict the processing of your personal information in certain circumstances.
- **Your right to object to processing** - You have the the right to object to the processing of your personal information in certain circumstances.

You are not required to pay any charge for exercising your rights. If you make a request, we have one month to respond to you.

Please contact us at secretary@napgc.org.uk if you wish to make a request.

How to complain

If you have any concerns about our use of your personal information, you can make a complaint to us at secretary@napgc.org.uk

You can also complain to the ICO if you are unhappy with how we have used your data.

The ICO's address and contact details are:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Helpline number: 0303 123 1113

ICO website: <https://www.ico.org.uk>