# Temple Holdings Limited T/A Temple Golf Club Privacy Policy

#### Introduction

At Temple Golf Club, we take your privacy seriously and this privacy policy statement explains what personal data or information we collect from members and non-members who communicate with us in person, by post, electronically or by visiting our website. It also explains how we use such data.

#### Changes to this privacy notice

This Privacy Policy may be updated or amended from time to time to reflect changes in our practices with respect to the processing of Personal Data, or changes in applicable law.

#### Who are we?

Temple Holdings Limited T/A Temple Golf Club is a registered company (Registration No: 00620066) and our registered office address is at Henley Road, Hurley, Berkshire, SL6 5LH. For the purposes of General Data Protection Regulations (GDPR) Temple Holdings Limited T/A Temple Golf Club (the Club) is a registered data controller.

#### What personal date or information do we collect?

If you are a **member** it is assumed that you are happy for us to store your personal information to service your membership. The personal information we collect may include your name, gender, date of birth, address, email address, IP address, contact telephone numbers, membership category, membership card number and card transactions, financial information regarding the invoicing and collection of your annual membership dues, and handicap details. We may also collect information regarding what pages you access/browse on the members area and public facing pages of this website and when.

If you are a non-member, the personal information we collect may include your name, address, email address, IP address, contact telephone numbers and information regarding what pages you access/browse on the public facing pages of this website and when.

#### How do we collect data or information from you?

- Membership application form
- Arising from an enquiry via our website, by email or in person or by telephone.
- If you take part in a prize draw or competition
- When you opt-in to receiving news, updates or press releases from us
- If you work for or with the Club or in relation to an enquiry about a job opportunity
- If you exchange business cards with a member of the Club

• If you make an individual or group golf or private function booking with us

#### How is your information used?

We collect your personal data or information to operate our club effectively, to service your membership or, if you are a non-member, to provide you with the best information on our products and services.

We may use your information:

- To effectively and professionally administer your golf club membership
- To answer enquiries that you make prior to any agreement or contract
- To keep you informed about our services, our insight into golfing trends and best practice and to make invitations to golf and non-golf related events but only if have opted-in to receive these communications.
- To notify you of competition results
- To process payment(s) for members' subscription and any other dues
- To process payment(s) for green fee visitors
- To process a job application
- To fulfil our obligations as an employer
- To provide benefits to you as an employee
- To maintain security of our office and IT infrastructure
- To invoice you, and to track payments you make or payments made to you

We believe that all these purposes are justified on the basis of our legitimate interests in running and promoting the Club, our contractual requirements to deliver the agreed membership services to you, and our legal obligations, both as a golf club and responsible employer. The table below shows how we process data:

# **Details of our processing**

	Type of Data Held	Length of Time Held	How Data is Held
Members	<ul> <li>Name, gender, DOB and membership and contact information.</li> <li>Emergency contact details.</li> <li>Information and documents relating to the membership we are providing, including. communications with you.</li> <li>Billing and payment information.</li> <li>Your handicap record.</li> <li>Under 18's medical conditions requiring treatment.</li> </ul>	We will retain information about you for the duration of your membership relationship with us and then for an additional 6 years.  We retain financial records for 6 years, following the end of the current financial year.  Handicap details are retained indefinitely via the Centralised Database of Handicaps.	We use Club Systems ClubV1, a password- controlled software package, to store your personal data including membership details and your handicap record.  The ClubV1 system stores personal data for as long as the Club uses the Club Systems' services or until Club Systems is expressly requested to delete personal data and/or there is no legal basis for retaining the personal data on the ClubV1 database. For more info go to: <a href="https://www.clubv1.co">https://www.clubv1.co</a> m/Content/Download C lubV1 processor agree ment.pdf  Handicap details are shared with Howdidido <a href="https://www.howdidido">https://www.howdidido</a> com/Account/Login?ret urnUrl=%2f)
Prospective Members	<ul> <li>Name, gender, DOB and membership and contact information.</li> <li>Information and documents relating to the services we are providing, including communications with you.</li> </ul>	If your application does not come to fruition, we will retain information about you for the duration of the enquiry and then for a further two years.	We use Club Systems Club V1 to record your details during the membership process.  For more info go to https://www.clubv1.co m/Content/Download C lubV1 processor agree ment.pdf

Job Applicants	<ul> <li>Name and contact information</li> <li>CV and application form.</li> <li>Name, gender, date</li> </ul>	We will retain information about you for the duration of the recruitment campaign and then one year.	Any documents received electronically are stored on a password-controlled IT system.
Current and Former Employees	<ul> <li>of birth, and contact information</li> <li>National insurance number and Unique Tax Reference (UTR)</li> <li>Information relating to your qualifications and experience</li> <li>Information relating to performance reviews.</li> </ul>	We will retain information about you for the duration of our contractual relationship with you, and then for an additional 6 years.	Current and former employees' data is stored in SAGE 50 Payroll which is hosted in secure servers both inside and outside the EEA. To see SAGE's privacy policy see:  http://www.sage.com/company/privacy-notice-and-cookies
Suppliers & Customers	<ul> <li>Contact details</li> <li>Suppliers bank details</li> <li>Description of the services bought or sold</li> </ul>	We retain financial records for 6 years, following the end of the current financial year.	We use the cloud based XERO accounting system. In common with many SaaS providers, XERO uses a top-tier, third-party data hosting provider (Amazon Web Services) with servers located in the U.S., to host online and mobile services.
Open Competition Entrants	<ul><li>Contact Details</li><li>Dates of previous visits</li></ul>	Open competition details are retained indefinitely	Data is stored in ClubV1 See note under "Members" above ref Club V1.

		We retain information about you for one year after your last visit.	We use BRS Golf by Golf Now to administer members and non- members golf and function bookings.
Green Fee Visitors	<ul><li>Name</li><li>Payment details</li></ul>	We retain financial records for 6 years, following the end of the current financial year.	For further information about how Golf Now stores and processes data, please click on the following link which will take you to the NBC Universal Privacy policy: <a href="https://www.nbcuniversal.com/privacy/">https://www.nbcuniversal.com/privacy/</a>

<sup>&</sup>quot;In Touch with Temple" Members Electronic Newsletter (via Mailchimp)

We want to keep members and non-members of the Club informed about news, events and exclusive offers.

For non-members we need your specific permission to do this and you must opt-in to our emails to remain on our database. If you decide to opt-in we promise we will not inundate you with emails, your details will never be shared with any third party and the information we send you will be relevant.

We will always treat any personal data we hold with the utmost respect.

We use a third-party provider Mail Chimp to deliver our members and non-members newsletters. To see Mailchimp's Privacy Policy click here: <a href="https://mailchimp.com/legal/privacy/">https://mailchimp.com/legal/privacy/</a>.

We gather statistics around email opening and clicks using industry standard technologies including clear gifs to help us monitor and improve our e-newsletter.

As a member you have the right to opt-out of some or all future communications by following the 'Unsubscribe' or 'Update your preferences' links included in the footer of every newsletter that we send. You may also opt-out from receiving future electronic communications by emailing <a href="marketing@templegolfclub.co.uk">marketing@templegolfclub.co.uk</a> and <a href="marketing@templegolfclub.co.uk">secretary@templegolfclub.co.uk</a>.

<sup>&</sup>quot;Keeping in Touch with Temple" Non-Members Electronic Newsletter (via Mailchimp)
"Tailored Shorts" Members Emails & Newsletters (via Club V1)

# **Emailing us**

We use Transport Layer Security (TLS) to encrypt and protect email traffic in line with government standards. If your email service does not support TLS, you should be aware that any emails we send or receive may not be protected in transit.

We will also monitor any emails sent to us, including file attachments, for viruses or malicious software. Please be aware that you have a responsibility to ensure that any email you send is within the bounds of the law.

# Who has access to your information?

We do not sell or rent your personal data or information to any third party or share your information with third parties for their marketing purposes.

We will disclose your data or information if required by law, for example by a court order or for the prevention of fraud or other crime.

We may pass your information on to our third-party service providers, agents or subcontractors for the purposes of completing a task or providing services to you on our behalf e.g. to manage your membership dues or handicap record. However, we only disclose the personal information necessary to deliver that service and have a contract in place that requires a third-party service provider to keep your information secure and not to use it for their own marketing purposes.

Third party services providers who act as data processors on our behalf:

- Club Systems International is the provider of ClubV1, the system we use to administer
  our membership and golf handicapping. At times Club Systems International may be
  required to remotely access our systems for maintenance, upgrade and support
  services. Club Systems International is not permitted to use the data we hold for its
  own purposes.
- Less Annoying IT provides the Club's IT support and at times may be required to remotely access our systems for maintenance, upgrade and support services. Less Annoying IT is not permitted to use the data we hold on our IT system for its own purposes.
- Feltons Chartered Accountants provide accounting services to the Club and at times may be required to remotely access our cloud-based XERO accounting system for support purposes. Feltons is not permitted to use the data we hold on XERO for its own purposes.

#### Transfers outside of the European Economic Area

Your personal information in the European Economic Area (EEA) is protected by GDPR but other countries do not necessarily protect your personal information in the same way. The EEA covers all countries in the EU plus Norway, Liechtenstein and Iceland. Temple Golf Club may use online tools offered by software providers which host data outside of the EEA. Prior to selecting such tools, we review their privacy policy and check that the company is signed up to the EU-US Privacy Shield agreement. Companies who have signed up to this agreement commit to securing personal data in line with EU data protection legislation.

# **Keeping your data secure**

When you give us personal information we take steps to ensure that it is treated securely and strive to protect it on our internal systems.

#### Your rights

You have certain rights over the processing of your personal information by Temple Golf Club:

- The right to be informed, which is what this privacy policy is for
- The right to access the data we hold about you
- The right to object to direct marketing
- The right to object to processing carried out on the basis of legitimate interests
- The right to erasure (in some circumstances)
- The right to data portability
- The right to have your data rectified if it is inaccurate
- The right to have your data restricted or blocked from processing

# How you can update your information

The accuracy of your information is important to us. If you change your contact details or if you want to update any of the information we hold on you, please contact us by email to <a href="mailto:secretary@templegolfclub.co.uk">secretary@templegolfclub.co.uk</a> or by post to The Secretary, Temple Golf Club, Henley Road, Hurley, Berkshire, SL6 5LH. Alternatively, you can telephone us on 01628 824795.

#### How you can access your personal information

You have the right to ask for a copy of the personal information Temple Gol Club holds relating to you. To do this please contact us by email to <a href="mailto:secretary@templegolfclub.co.uk">secretary@templegolfclub.co.uk</a> or by post to The Secretary, Temple Golf Club, Henley Road, Hurley, Berkshire, SL6 5LH. Alternatively, you can telephone us on 01628 824795.

You also have the right to lodge a complaint about our processing of your personal data with the UK's Information Commissioner's Office.

#### **COOKIE POLICY**

#### What's a cookie?

A "cookie" is a piece of information that is stored on your computer's hard drive which records how you move your way around a website so that, when you revisit that website, it can present tailored options based on the information stored about your last visit. Cookies can also be used to analyse traffic and for advertising and marketing purposes.

Cookies are used by nearly all websites and do not harm your system.

If you want to check or change what types of cookies you accept, this can usually be altered within your browser settings. You can block cookies at any time by activating the setting on your browser that allows you to refuse the setting of all or some cookies. By not blocking cookies and continuing to browse, by default you are authorising the use of cookies. If you use your browser settings to block all cookies (including essential cookies) you may not be able to access all or parts of our site.

# How do we use cookies?

We use cookies to track your use of our website. This enables us to understand how you use the site and track any patterns with regards how you are using our website. This helps us to develop and improve our website as well as products and / or services in response to what you might need or want.

#### Cookies are either:

Session cookies: these are only stored on your computer during your web session and are automatically deleted when you close your browser – they usually store an anonymous session ID allowing you to browse a website without having to log in to each page, but they do not collect any personal data from your computer; or

Persistent cookies: a persistent cookie is stored as a file on your computer and it remains there when you close your web browser. The cookie can be read by the website that created it when you visit that website again. We use persistent cookies for Google analytics.

Cookies can also be categorised as follows:

Strictly necessary cookies: these cookies are essential to enable you to use the website effectively, such as when buying a product and / or service, and therefore cannot be turned off. Without these cookies, the services available to you on our website cannot be provided.

These cookies do not gather information about you that could be used for marketing or remembering where you have been on the internet.

Performance cookies: these cookies enable us to monitor and improve the performance of our website. For example, they allow us to count visits, identify traffic sources and see which parts of the site are most popular.

Functionality cookies: these cookies allow our website to remember choices you make and provide enhanced features. For instance, we may be able to provide you with news or updates relevant to the services you use. They may also be used to provide services you have requested such as viewing a video or commenting on a blog. The information these cookies collect is usually anonymised.

Please note that third parties who advertise on our website (including, for example, advertising networks and providers of external services like web traffic analysis services) may also use cookies, over which we have no control. These cookies are likely to be analytical/performance cookies or targeting cookies.