

PRIVACY POLICY

1. IMPORTANT INFORMATION AND WHO WE ARE

Privacy policy

The Buckinghamshire Golf Club is committed to protecting your personal information and ensuring it is secure. This privacy policy explains how we collect, use, store, transfer and secure your personal information.

- We shall only use your personal information in compliance with the applicable data protection laws.
- We shall hold your personal information in a secure environment.
- We shall restrict access to your personal information to those who need to know it.

Data controller

Buckinghamshire Golf Company Limited (company number 02395603) is the controller responsible for your personal data (collectively referred to as "The Buckinghamshire Golf Club", "we", "us" or "our" in this privacy policy).

Buckinghamshire Golf Company Limited is part of a group of companies known as the Arora Group, details of which can be found here: <https://thearoragroup.com/>

We may share personal data with other companies in our group where this is required to manage your membership. All members of our group will handle your personal data in accordance with this privacy policy.

If you have any questions about this privacy policy, including any requests to exercise your legal rights (Section 12), please contact our group data protection officer ("DPO") using the information set out in the contact details section (Section 13).

2. THE TYPES OF PERSONAL DATA WE COLLECT ABOUT YOU

Personal data means any information about an individual from which that person can be identified.

We may collect, use, store and transfer different kinds of personal data about you which include:

- **Identity Data** includes, for example, first name, last name, any previous names, username or similar identifier, marital status, title, nationality, date of birth, age, gender, occupation, information contained on a form of identification (such as ID card, passport or driver licence), member number, profile picture.
- **Contact Data** includes, for example, billing address, delivery address, email address, telephone numbers.
- **Financial Data** includes, for example, bank account, payment card details.
- **Transaction Data** includes, for example, details about payments to and from you, other details of products and services you have purchased from us.

- **Technical Data** includes, for example, 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, device ID, other technology on the devices you use to access our website.
- **Profile Data** includes, for example, your username and password, purchases or orders made by you, your interests, preferences, feedback and survey responses.
- **Usage Data** includes, for example, information about how you interact with and use our website, products and services.
- **Marketing and Communications Data** includes, for example, your preferences in receiving marketing from us and our third parties and your communication preferences.
- **Health Data** includes, for example, information on past, current or future health status, injury, disease or disability.

The information collected in relation to persons under 18 years of age is limited to their age, name, date of birth and nationality , which can only be supplied to us by an adult with legal parental responsibility for the person concerned. We would be grateful if you could ensure that your children do not send us any personal data without your consent (particularly via the internet). If such data is sent, you can contact the DPO (Section 13) to arrange for this information to be deleted.

3. HOW IS YOUR PERSONAL DATA COLLECTED

We may use different methods to collect data from and about you including through:

- **Your interactions with us.** You may give us your personal data by filling in online or paper forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
 - apply for membership;
 - apply for our products or services;
 - create an account on our website;
 - subscribe to our service or publications;
 - request marketing to be sent to you;
 - enter a competition, promotion or survey; or
 - give us feedback or contact us.
- **Automated technologies or interactions.** As you interact with our website, we will automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies.

4. HOW WE USE YOUR PERSONAL DATA

Legal basis

The law requires us to have a legal basis for collecting and using your personal data. We rely on one or more of the following legal bases:

- **Performance of a contract with you.** Where we need to perform the contract we are about to enter into or have entered into with you, for example your membership agreement.
- **Legitimate interests.** We may use your personal data where it is necessary to conduct our business and pursue our legitimate interests, for example to prevent

fraud and enable us to give you the best and most secure member experience. We make sure we consider and balance any potential impact on you and your rights (both positive and negative) 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).

- **Legal obligation.** We may use your personal data where it is necessary for compliance with a legal obligation that we are subject to. We will identify the relevant legal obligation when we rely on this legal basis.
- **Consent.** We rely on consent only where we have obtained your active agreement to use your personal data for a specified purpose, for example if you subscribe to an email newsletter.

Purposes for which we will use your personal data

The table below sets out why we may process your data and the lawful basis for the processing.

Purpose/Use	Type of data	Legal basis
To register you as a new member	(a) Identity (b) Contact	Performance of a contract with you (your membership agreement)
To process, maintain, fulfil and ensure the proper administration of your membership: (a) Manage payments, fees and charges (b) Collect and recover money owed to us	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Marketing and Communications	(a) Performance of a contract with you (your membership agreement) (b) Necessary for our legitimate interests (to recover debts due to us)
To manage our relationship with you which will include: (a) Notifying you about changes to our terms of membership (b) Dealing with your requests, complaints and queries	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications	(a) Performance of a contract with you (your membership agreement) (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated and manage our relationship with you)
To operate our club in compliance with applicable laws which will include:	(a) Identity (b) Contact	(b) Necessary to comply with a legal obligation

(a) Ensuring compliance with age restrictions applicable to the sale of alcohol		
To enable you to take part in events	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications	Performance of a contract with you (your membership agreement)
To enable you to partake in a prize draw, competition or complete a survey	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications	(a) Performance of a contract with you (your membership agreement) (b) Necessary for our legitimate interests (to study how members use our products/services, to develop them and grow our business)
To enable you to suspend your membership for medical reasons or give you access to specific equipment	(a) Health	(a) Consent
To enable you to use our Club app	(a) Identity (b) Contact	(a) Consent
To administer and protect our business and website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Technical	(a) 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) (b) Necessary to comply with a legal obligation
To deliver relevant website content and online advertisements to you and measure or understand the effectiveness of the advertising we serve to you	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications	Necessary for our legitimate interests (to study how members use our products/services, to develop them, to grow our business and to inform our marketing strategy)

	(f) Technical	
To use data analytics to improve our website, products/services, member relationships and experiences and to measure the effectiveness of our communications and marketing	(a) Technical (b) Usage	Necessary for our legitimate interests (to define types of members for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)
To send you relevant marketing communications and make personalised suggestions and recommendations to you about goods or services that may be of interest to you based on your Profile Data	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile (f) Marketing and Communications	Consent, having obtained your prior consent to receiving direct marketing communications

5. MARKETING

We will only send you marketing communications where you have consented to receive them and using your preferred channels of communication.

You can ask to stop sending you marketing communications at any time by contacting us. If you opt out of receiving marketing communications, you will still receive service-related communications that are essential for administrative or member service purposes, for example, relating to updates to our Terms and Conditions of Membership or checking that your contact details are correct.

We will get your express consent before we share your personal data with any third party for their own direct marketing purposes.

6. CCTV

To ensure public safety and security and for the prevention and detection of crime, CCTV is in operation within the Buckinghamshire Golf Club premises. We retain CCTV images for a reasonable period after they are collected, and will retain those images for a longer period if they are required for any legal or regulatory reasons.

Please be aware that if we are requested to provide CCTV images of you or any other personal information relating to you by the police or any other regulatory or government authority investigating suspected illegal activities, we are obliged to do so.

We collect this information so we can protect your vital interests and the vital interests of and all other persons using, visiting or working at the Buckinghamshire Golf Club.

7. COOKIES

For more information about the cookies we use and how to change your cookie preferences, please see <https://bucksgc.intelligentgolf.co.uk/cookie-usage.php>.

8. DISCLOSURES OF YOUR PERSONAL DATA

We may share your personal data where necessary with the parties set out below for the purposes set out in the table at Section 4 above.

- Internal Third Parties. We may share your data with a number of authorised people and departments in the Arora Group.
- External Third Parties. Your personal data may be sent to a third party for the purposes of supplying you with services, for example, to external service providers such as IT sub-contractors, banks, credit card issuers or external lawyers.
- Third parties to whom we may choose to sell, transfer or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy policy.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

9. INTERNATIONAL TRANSFERS

We may transfer your personal data to service providers that carry out certain functions on our behalf. This may involve transferring personal data outside the UK to countries which have laws that do not provide the same level of data protection as the UK law.

Whenever we transfer your personal data out of the UK to service providers, we ensure a similar degree of protection is afforded to it by ensuring that the following safeguards are in place:

- We will only transfer your personal data to countries that have been deemed by the UK to provide an adequate level of protection for personal data; or
- We may use specific standard contractual terms approved for use in the UK which give the transferred personal data the same protection as it has in the UK.

By downloading our Club app, you do consent to your personal data being transferred outside the UK. Please refer to Pacesetter's (our service provider's) privacy policy presented to you when downloading the Club app for further information on how Pacesetter will process your personal data.

10. 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.

11. DATA RETENTION

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

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, regulatory, tax, accounting or other requirements.

By law we have to keep basic information about our members (including Contact, Identity, Financial and Transaction Data) for six years after they cease being members for tax purposes.

In some circumstances you can ask us to delete your data: see Section 12 below for further information.

12. YOUR LEGAL RIGHTS

You have a number of rights under data protection laws in relation to your personal data.

You have the right to:

- Request access to your personal data (commonly known as a “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.
- Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- Request erasure of your personal data in certain circumstances. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) as the legal basis for that particular use of your data (including carrying out profiling based on our legitimate interests). In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your right to object.
- You also have the absolute right to object any time to the processing of your personal data for direct marketing purposes (see Section 5).

- Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- Withdraw consent at any time where we are relying on consent to process your personal data (see the table in Section 4). However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you.
- Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in one of the following scenarios:
 - If you want us to establish the data's accuracy;
 - Where our use of the data is unlawful but you do not want us to erase it;
 - Where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or
 - You have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

If you wish to exercise any of the rights set out above, please contact us (Section 13).

No fee usually required

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we could refuse to comply with your request in these circumstances.

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 could 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.

13. CONTACT DETAILS

If you have any questions about this privacy policy or about the use of your personal data or you want to exercise your privacy rights, please contact our DPO by email to gdpr@thearoragroup.com.

14. COMPLAINTS

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

15. CHANGES TO THE PRIVACY POLICY AND YOUR DUTIES TO INFORM US OF CHANGES

We keep our privacy policy under regular review.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us, for example a new address or email address.

16. THIRD-PARTY LINKS

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 policy of every website you visit.