

# Privacy Policy

## Introduction

Greenbanks Golf Ltd understands that your privacy is important to you and we care about how your personal data is used. We respect and value the privacy of all of our members and customers and will only collect and use personal data in ways that are described below, and in a way that is consistent with our obligations and your rights under the law.

In accordance with the General Data Protection Regulations (GDPR), we have implemented this privacy notice to inform you, our members/customers of the types of data we process about you. We also include within this notice the reasons for processing your data, the lawful basis that permits us to process it and your rights regarding your data.

## What is Personal Data?

Personal data is defined by the General Data Protection Regulation (EU Regulation 2016/679) (the “GDPR”) as “any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier”.

Personal data is, in simpler terms, any information about you that enables you to be identified. Personal data covers obvious information such as your name, and contact details, but it also covers less obvious information, such as identification numbers, electronic location data and other online identifiers.

## How do we collect Personal Data from you?

We obtain information about you when you use our website, for example, when you communicate to us via the “contacts” page, make an on-line booking, sign up to receive our newsletter or hear about an event.

## What type of Personal Data is collected from you?

The personal information we collect might include the following, depending on what information you choose to provide:

- Name
- Address
- Email Address
- Telephone Number
- Organisation Name / Job Title
- Information about your preferences and interests

If you have agreed to receive marketing and promotional information from us, we will send that out to you using your preferred contact method. We will not use the information you gave us to find out more about you.

Your Personal Data is kept within the Company's secure IT system and stored on servers. We do not sell or rent your information to third parties and we do not share your information with third parties for marketing purposes.

Under no circumstances will we hold sensitive payment details such as your card number, expiry date and security code. All transactions are handled using a secure server hosted by World Pay and Sage Pay. For more information on their Privacy Policies, please go to their web sites.

The GDPR requires us to rely on one or more lawful grounds to process your personal information. The following are the grounds we use:

- Consent
- Legitimate Interests

## **How is your Personal Data used?**

Under the GDPR, we must always have a lawful basis for using personal data. This may be because the data is necessary for our performance of a contract with you, because you have consented to our use of your personal data, or because it is in our legitimate business interests to use it.

## **We may use your Personal Data to:**

- Process payments that you have made.
- Notify you of changes.
- Send you communications which you have requested and that may be of interest to you. These may include information about events, service and publications.

We review our retention periods for personal information on a regular basis. We are legally required to hold some types of information to fulfill our statutory obligations. We will hold your personal information on our systems for as long as is necessary for the relevant activity. This is to ensure that we have a record of what we did in the event of a complaint or legal claim.

You will not be sent any unlawful marketing or spam. We will always work to fully protect your rights and comply with our obligations under the GDPR and the Privacy and Electronic Communications (EC Directive) Regulations 2003.

## Your Right's Under GDPR:

GDPR provides the following rights for individuals, which are:

1. The right to be informed
2. The right of access
3. The right to rectification
4. The right to erasure
5. The right to restrict processing
6. The right to data portability
7. The right to object

The link below provides a full explanation of these rights, from the Information Commissioner's Office:

<https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/right-to-be-informed/>

## How can you access your Personal Data?

If you want to know what personal data we have about you, you can ask us for details of that personal data and for a copy of it. This is known as a "subject access request". All subject access requests should be made in writing and sent to the following email or address:

Postal Address: Greenbanks Golf Ltd, Blacknest Golf and Country Club, Frith End Road, Blacknest, Alton, GU34 4QL

Email Address: [info@blacknestgolf.co.uk](mailto:info@blacknestgolf.co.uk)

We will respond to your subject access request within seven working days of receiving it. We will provide full details of your personal data that we hold within Greenbanks Golf Ltd.

## How do you "opt-out" or change details of your Personal Data?

You can "opt-out" or change details to your personal data, at any time. This can be done in writing and sent to the following email or address:

Postal Address: Greenbanks Golf Ltd, Blacknest Golf and Country Club, Frith End Road, Blacknest, Alton, GU34 4QL

Email Address: [info@blacknestgolf.co.uk](mailto:info@blacknestgolf.co.uk)

We will respond to your written request within seven working days of receiving it, confirming that we have adhered to your wish.

## **How to make a formal complaint regarding your Personal Data**

If you want to make a formal complaint regarding your Personal Data, this can be done in writing and sent to the following email or address:

Postal Address: Greenbanks Golf Ltd, Blacknest Golf and Country Club, Frith End Road, Blacknest, Alton, GU34 4QL

Email Address: [info@blacknestgolf.co.uk](mailto:info@blacknestgolf.co.uk)

We will respond to your written request within seven working days of receiving it, confirming that we have adhered to your wish.

## **Changes to this Privacy Notice**

We may change the Privacy Notice from time to time. This may be required if, for example, if the law changes, or if we change our business in a way that affects personal data permission.

Any changes will be made available on our website