



## **Privacy Policy – Shaw Hill Members**

Shaw Hill Limited treats the privacy of its customers, guests, visitors, members (BRS, Club V1, and England Golf), and website users very seriously and we take appropriate security measures to safeguard your privacy. This policy explains how we protect and manage any personal data\* you share with us and that we hold about you, including how we collect, process, protect and share that data.

\*Personal data means any information that may be used to identify an individual, including, but not limited to, a first and last name, a home or other physical address and an email address or other contact information, whether at work or at home.

### **How we obtain your personal data**

#### **Information provided by you**

You provided us with personal data either on your visit, registration, membership or application form, via an online application, email or over the telephone. This includes name, address, and date of birth, email address and direct debit mandate instructions, this list is not exhaustive. We use this information to manage and administer your visit, process your sale of onsite products/services or your membership.

We may also keep information contained in any correspondence you may have with us by post or by email.

We may obtain or hold sensitive medical information directly from you if you have disclosed this to administer your membership. The provision of this information is subject to you giving us express consent. If we do not receive this consent from you, then we may be unable to consider any requests made as part of your membership. This information is kept if your membership is current and is retained to meet any legal, statutory and regulatory obligations.

The provision of this personal data is also essential for us to be able to collect payments for your visit, stay, membership or to administer your sale or purchase of services on site, including verifying your identity when you contact us to discuss your request. This means that the legal basis of our holding your personal data is for the performance of a contract.

#### **What Information we may hold about you**

Personal information that we may hold about you on BRS/ Club v1/ How Did I do/ Xpos and Premier Manager:

- Title, Name, Date of Birth & gender
  - Address, Email address & phone number
  - Medical information (if required)
  - Handicap information
- (this list may not be exhaustive)

This information is held to administer your contract of sale or services at Shaw Hill. Access to some of the above listed data may be accessible to Club Officials and Club Secretaries (with the exception of medical data). Some of your personal details may be displayed on notice boards in the club house in relation to competitions.

#### **Information we get from other sources**

We only obtain information from third parties if this is permitted by law. We may also use legal public sources to obtain information about you, for example, to verify your identity.

This information (including your name and address, email address, date of birth, etc), as relevant to us, will only be obtained from reputable third-party companies that operate in accordance with the General data protection Regulation (GDPR). You will

already have submitted your personal data to these companies and specifically given permission to allow them to pass this information to other companies that provide similar or complementary products and services to those we offer.

### **How we use your personal data**

We use your personal data to manage and administer your visit, stay, membership or to administer your sale or purchase of services on site. We also act as a controller and processor of any Direct Debit instructions or pre-paid deposit. We undertake measures at all times to protect your personal data, including any health and financial details, in a manner which is consistent with the requirements of the General Data Protection Regulation (GDPR) concerning data protection. We will also take reasonable security measures to protect your personal data in secure storage.

### **Where there is a legitimate interest**

We may use the personal information you provide where there is a legitimate interest as a business for the following purposes:

- (1) to understand the use of our services and products and make improvements;
- (2) to fulfill prizes;
- (3) to respond to specific requests from visitors, guest, members;
- (4) to protect the security or integrity of our business when necessary;
- (5) to send you notices and solicitations regarding general offers;
- (6) for marketing activities to send you communications or send targeted marketing messages that relate to offers that are specific to you or part of your membership, this may be done via social media or other platforms that we may use;
- (6) in general, to promote and market products to you available on all site businesses.

These solicitations may take the form of mailings or other couriers, telephone calls, e-mail solicitations (including BRS & Club V1 for members) and other methods of contact. If you do not want to receive these solicitations from us using your personal identifiable information, please notify us.

### **Information and cookies**

A cookie is a small text file stored on your browser, for example internet explorer. For details of how we use cookies please refer to our Internet Privacy Policy on the website.

### **Sharing Information**

We will keep information about you confidential and we will not share your personal data other than within businesses associated with Shaw Hill Golf Club e.g. Lancashire Golf Academy. We will only disclose your information with other third parties with your express consent except for the following categories of third parties.

#### **Categories of third parties**

- Insurance companies, loss assessors, regulatory authorities and other fraud prevention agencies and to comply with any legal and regulatory issues and disclosures;
- Any mailing or printing agents, contractors and advisors that provide a service to us or act as our agents on the understanding that they keep the information confidential;
- Anyone to whom we may transfer our rights and duties under any agreement we have with you;
- Any legal or crime prevention agencies and/or to satisfy any regulatory request (including recognised government bodies) if we have a duty to do so or if the law allows us to do so.

#### **Transfer of your personal data outside of the European Economic Area (EEA)**

We do not currently transfer your personal data outside the EEA

## **How long do we keep this information about you?**

We keep information in line meeting any legal, statutory and regulatory obligations. This personal information will be reassessed on a regular basis and information which is no longer required will be disposed of.

## **Data Subject Rights**

### **Subject access requests**

The (GDPR) grants you (hereinafter referred to as the 'data subject' the right to access personal data that we hold about you. This is referred to as a subject access request. We shall respond promptly and certainly within one month from the point of receiving the request and all the necessary information about you. Our formal response shall include details of the personal data we hold about you are including the following:

- Sources from which we acquired the information;
- The purposes for processing the information; and
- Persons or entities with whom we are sharing the information

### **Right to rectification**

You, the data subject, shall have the right to obtain from us without undue delay, the rectification of inaccurate personal data we hold concerning you. Considering the purposes of the processing, you, the data subject, shall have the right to have incomplete personal data completed, including by means of providing a supplementary statement.

### **Right to erasure**

You, the data subject, shall have the right to obtain from us restriction of processing where one of the following applies:

- A) The accuracy of the personal data is contested by you, the data subject, and is restricted until the accuracy of the data has been verified;
- B) The processing is unlawful and you, the data subject, oppose the erasure of the personal data and instead request the restriction in its use;
- C) We no longer need the personal data for the purposes of processing, but it is required by you, the data subject for the establishment, exercise or defiance of legal claims;
- D) You, the data subject, have objected to processing of your personal data pending the verification of whether there are legitimate grounds for us to override these objections.

### **Notification obligation regarding rectification of erasure of personal data or restriction of processing**

We shall communicate any rectification or erasure of personal data or restriction of processing as described above to each recipient to whom the personal data has been disclosed, unless this proves impossible or involves disproportionate effort. We shall provide you, the data subject, with information about those recipients if you request from us.

### **Right to object**

You, the data subject, shall have the right to object, on grounds relating to your particular situation, at any time to the processing of personal data concerning you, including any personal profiling; unless this relates to processing that is necessary for the performance of a task carried out in the public interest or an exercise of official authority vested in us. We shall no longer process the personal data unless we can demonstrate compelling legitimate grounds for the processing which override the interested, rights and freedoms of you, the data subject, or for the establishment exercise or defence of legal claims.

### **Right to not be subject to decisions based solely on automated processing**

We do not carry out any automated processing, which may lead to an automated decision based on your personal data.

### **Correcting and updating your personal information**

The accuracy of your information is important to us. In the meantime, if you change your name or address/email address, or you discover that any other information we hold is inaccurate or out of date, please let us know by contacting the membership secretary or the Club Secretary.

### **Withdrawing Consent**

As we rely on using your personal information for processing your contract with us should you wish to withdraw consent to receive any further notifications or membership offers etc as listed above this may potentially restrict your access on membership systems and BRS and club competitions. This would need to be done manually with the Pro Shop. To withdraw any consent please refer to the Club Secretary or email [golf@shaw-hill.co.uk](mailto:golf@shaw-hill.co.uk)

### **Invoking your rights**

If you would like to invoke any of the above data subject rights with us, please write to the Data protection Officer at Shaw Hill, Preston Road, Whittle-Le-Woods, Chorley, Lancashire, PR6 7PP or email [info@shaw-hill.co.uk](mailto:info@shaw-hill.co.uk)

### **Accuracy of information**

In order to provide the highest level of customer service possible, we need to keep accurate personal data about you. We take reasonable steps to ensure the accuracy of any personal data or sensitive information we obtain. We ensure that the source of any personal data or sensitive information is clear, and we carefully consider any challenges to the accuracy of the information. We also consider when it is necessary to update the information, such as name or address changes and you can assist by informing us of any changes when they occur.

## **Important information**

### **Questions and queries**

If you have any questions or queries which are not answered by this Privacy Policy, or have any potential concerns about how we may use the personal data we hold, please write to Data protection Officer at Shaw Hill, Preston Road, Whittle-Le-Woods, Chorley, Lancashire, PR6 7PP or email [info@shaw-hill.co.uk](mailto:info@shaw-hill.co.uk)

### **Policy changes**

This Privacy policy is regularly reviewed. This is to make sure that we continue to meet the highest standards and to protect your privacy. We reserve the right, at all times, to update, modify or amend this policy. We suggest that you review this Privacy policy from time to time to ensure you are aware of any changes we may have made; however, we will not significantly change how we use information you have already given to us without your prior agreement. The latest version of this policy can be found at <http://www.shaw-hill.co.uk/members> section

### **If you have a complaint**

If you have a complaint regarding the use of your personal data or sensitive information then please contact us by writing to the Data protection Officer at Shaw Hill, Preston Road, Whittle-Le-Woods, Chorley, Lancashire, PR6 7PP or email [info@shaw-hill.co.uk](mailto:info@shaw-hill.co.uk) and we will do our best to help you.

If your complaint is not resolved to your satisfaction and you wish to make a formal complaint to the Information Commissioner's Office (ICO), you can contact them on 01625545745 or 0303123113. You also have the right to judicial remedy against a legally binding decision of the ICO where you consider that your rights under this regulation have been infringed as a result of the processing of your personal data. You have the right to appoint a third party to lodge the complaint on your behalf and exercise your right to seek compensation.