



Cambridgeshire Area Golf Union

CAGU PRIVACY POLICY

A. ABOUT THIS DOCUMENT

This privacy policy explains how CAGU collect, use and share personal data, and your rights in relation to the personal data we hold. This privacy policy concerns our processing of personal data of employees, officers, volunteers, players and national and regional contacts. CAGU is not involved in any form of marketing, sales, promotional or advertising activity and exists solely to promote and organise golf on behalf of its members. All information is collected under the terms of legitimate interest in a shared activity and the data collected is solely for the purpose of organising golfing events on behalf its members, and as a means of providing golfing information to its members.

B. CONTROLLER

For the purposes of the General Data Protection Regulation ("GDPR") and UK data protection laws, the Controller for data under this Policy is the CAMBRIDGESHIRE AREA GOLF UNION (CAGU)

C. HOW WE COLLECT YOUR INFORMATION

1. CAGU may collect your personal data in a number of ways, for example:
 - i. during the course of employment, engagement or as a volunteer, officer or player representing the CAGU or playing in an event organized by CAGU;
 - ii. as a player when you submit entry forms for county events;
 - iii. when your name is submitted as a nominated council representative of a member club;
 - iv. as the advertised manager of one of our member clubs;
 - v. by completing a junior registration form when joining the County junior coaching programme;
 - vi. by receiving contact details of nominated representatives of regional or national organizations or other county bodies.

D. THE TYPES OF INFORMATION WE COLLECT

1. The information we collect may include the following types of personal data about you (and your family members and 'next of kin', where relevant):
 - i. contact details (including email address(es), telephone numbers and postal address(es);
 - ii. contact details (as above) for your family members and 'next of kin' (junior members only);
 - iii. records of communications and interactions we have had with you;
 - iv. images taken during County events;
 - v. financial information, including: your bank account number(s), name(s) and sort code(s) (used for paying an employees salary and processing other payments e.g. entry fees;
 - vi. your involvement with/membership of other golfing related organizations or activities;
 - vii. for employees their tax status and other work-related information, including personal data captured in the work documents created while employed by CAGU or otherwise engaged to work with CAGU;
2. We will also collect 'special categories' of data:
 - i. information concerning health and medical conditions (only in the case of junior players as required by safeguarding regulations);



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- ii. information resulting from DBS checks where required for employees and volunteers working with juniors as required by safeguarding regulations. This will include criminal convictions and offences data.

E. HOW WE USE YOUR INFORMATION

1. The purposes for which we may use personal data (including special categories of personal data and criminal offences data, where applicable) we collect result solely through the need to communicate with persons who are directly involved with us and include:
 - i. administering the direct activities of CAGU by telephone, post or email;
 - ii. notifying players of their entry to and details of a competition;
 - iii. circulating minutes of meetings to nominated representatives or other appropriate people;
 - iv. carrying out due diligence checks during the application process for a role where safeguarding needs to be considered;
 - v. contacting family members in cases of emergency with junior personnel;
 - vi. dealing with legal claims and requests, including those made under data protection law, or requests for disclosure by competent authorities;
 - vii. sharing personal data with national and/or regional associations and other competition venues for reasonable purposes in connection with shared golfing events;
 - viii. to pay staff and to administer payments to volunteers in connection with work undertaken with us;
 - ix. for tax purposes, including transferring it to HM Revenue and Customs to ensure that employees have paid appropriate amounts of tax, where relevant.

F. THE REASONS FOR PROCESSING YOUR INFORMATION

1. We may process your personal data for the above purposes because:
 - i. it is necessary for the performance of a contract with you;
 - ii. it is necessary for our legitimate interests. Our "legitimate interests" include our reasonable interests in the operation of the Union for the benefit of its members;
 - iii. it is necessary to protect your or another person's vital interests (in certain limited circumstances, for example where junior players may require health services when at away events);
 - iv. we have your specific or, where necessary, explicit consent to do so. This will only be requested in special circumstances involving sensitive data;
 - v. for compliance with our legal obligations (e.g. to exercise or perform any right or obligation conferred or imposed by law including in connection with employment or for the prevention and detection of crime, and in order to assist with investigations (including criminal investigations) carried out by the police and other competent authorities).

G. SHARING YOUR INFORMATION WITH OTHERS

1. We may share personal data with certain third parties for the purposes set out in this privacy policy and to third parties and the purposes may include:



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- i. accountancy firms for payment of salaries and expenses. Such data will be subject to the privacy policy of the accountancy firm;
- ii. contact details of CAGU staff, officers and volunteers will be shared within all parts of CAGU;
- iii. CAGU officers and key officials will have contact details displayed on the website;
- iv. bank details supplied when making competition entries to CAGU will be retained with the appointed payment processor eg Paypal and any such data will be subject to their privacy policy;
- v. contact details may given to the national and regional golf unions and other counties solely for the purpose of shared golfing activities and interests;
- vi. in case of an emergency health data relating to junior persons may be shared with health professionals;
- vii. images of persons taken at golfing events may be displayed on the website. In the case of young persons under 18, written parental consent will be obtained before use;
- viii. when we are legally required to do so (by a court, government body, law enforcement agency or other authority of competent jurisdiction), for example by HM Revenue and Customs;

H. HOW INFORMATION IS STORED

1. Personal data is held electronically in password protected devices.
2. Sensitive data such as health information for junior personnel is retained in hard copy files and stored in a locked facility.

I. HOW LONG YOUR INFORMATION IS KEPT

1. Personal data is kept only for as long as necessary for each purpose we use it. For most employee, officer, volunteer or club representative data this means it is kept for as long as there is an active involvement with CAGU.
2. In the case of players entering competitions, contact data will be retained securely for future competitions. Entry information made via the website will be erased at the end of the playing season.
3. Health and parental information will be destroyed at the end of each season.
4. Images taken during CAGU events will be retained for a period of 12 months or completion of the same event the following year, whichever is the later.

J. YOUR RIGHTS

1. Under certain circumstances, by law you have the right to:
 - i. request access to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the data we hold about you and to check that we are lawfully processing it.;
 - ii. request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.;
 - iii. request erasure of your personal data. 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 exercised your right to object to processing (see below);



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- iv. object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground;
 - v. request the restriction of processing of your personal data. This enables you to ask us to suspend the processing of personal data about you, for example if you want us to establish its accuracy or the reason for processing it. You can also withdraw your consent, where this is the basis for our processing your information (without affecting the lawfulness of our previous processing based on consent);
 - vi. request the transfer of your personal data to another party.
2. Please note that the above rights are not absolute, and we may be entitled to refuse requests where exceptions apply.
 3. If you have given your consent and you wish to withdraw it, please contact CAGU, using the contact details set out below.

K. CONTACT AND COMPLAINTS

1. If you have any queries about this privacy policy or how we process your personal data, or if you wish to exercise any of your rights, you may contact CAGU:
 - by email: cagusecretary@gmail.com;
 - by telephone: 01223 870704;
 - or by post: 113 New Road, Haslingfield, Camb CB23 1LP.
2. If you are not satisfied with how we are processing your personal data, and we cannot resolve the matter with you, you can make a complaint to the Information Commissioner.
3. You can find out more about your rights under applicable data protection legislation from the Information Commissioner's Office website available at www.ico.org.uk.