



Castletroy Golf Club



Data Protection Policy

Document No	Date	Document owner	Approved by	Page number
CGCPOL0001-22 Version 1 Prepared by Tineke Leonard	19/09/22	Board of Management	Board of Management Signed: Pat Quinlan Date: 19/09/22 Review Date: 19/09/25	Page 1 of 13



Contents

1 Data Protection Policy3

2 Who we are & how to contact us3

3 Why is this policy relevant.....3

4 Who does this policy apply to.....3

5 Data Protection Principles.....4

6 Collection and use of personal data4

6.1 Membership & Administration4

6.2 Communications5

6.3 Finance Management5

6.4 Monitoring & Security6

7 Children’s Data6

8 CCTV.....6

9 How we collect personal data7

10 How we store data7

11 If you decide not to provide personal data.....7

12 Lawful bases for processing7

13 Who we share data with (disclosure to third parties)8

13.1 Within our club8

13.2 Third party business suppliers and/or data processors.....8

13.3 Other third parties9

14 Social Media & Third-Party Websites9

15 Photographs, Videos, Testimonials.....9

16 Marketing / Promotion 10

17 Third Party Service Providers/Data Processors..... 10

18 Your data protection rights..... 10

19 Data Breach Management 11

20 How long we keep data for 11

21 Confidentiality & Security..... 12

22 Transfer of personal data outside of the EEA (European Economic Area) 12

23 Transfer of ownership..... 13

24 Questions & Complaints..... 13

25 Changes to this policy 13

Document No	Date	Document owner	Approved by	Page number
CGCPOL0001-22 Version 1 Prepared by Tineke Leonard	19/09/22	Board of Management	Board of Management Signed: Pat Quinlan Date: 19/09/22 Review Date: 19/09/25	Page 2 of 13



1 DATA PROTECTION POLICY

Protecting your personal data is important to us, and we understand how important it is to you. Our aim is to be as clear and open as possible about what personal data we process and why we process it. This data protection policy sets out how we, Castletroy Golf Club process and protect any personal data you provide us when you visit our website (www.castletroygolfclub.ie) and our golf club in Castletroy, Limerick or when you communicate with us in any way.

We will comply with the requirements of the General Data Protection Regulation (GDPR) 2016/679 and the relevant Irish legislation, namely the Data Protection Acts 1988 – 2018 and the ePrivacy Regulations S.I. 336/2011.

2 WHO WE ARE & HOW TO CONTACT US

Castletroy Golf Club is a private member's golf club. We are the Data Controller for personal data we collect and use about you. We are located at Golf Links Road, Castletroy, Co. Limerick, V94 TW8H, Ireland.

If you have any questions about how we process your personal data, or to exercise your access rights please email us at golf@castletroygolfclub.ie, tel: 061 335753 or write to our Office Administrator at the address listed above.

3 WHY IS THIS POLICY RELEVANT

The purpose of this policy is to let you know what personal data we are processing about you. It includes both online and offline data processing activities such as the data we collect when you visit our website, when you visit our golf club and when you communicate with us.

4 WHO DOES THIS POLICY APPLY TO

This Policy covers our treatment of your personal data that we gather when you are interacting with Castletroy Golf Club as a member, committee/subcommittee member, visitor, vendor, supplier, website user, or otherwise ("Data Subject"). In the course of conducting our business

Document No	Date	Document owner	Approved by	Page number
CGCPOL0001-22 Version 1 Prepared by Tineke Leonard	19/09/22	Board of Management	Board of Management Signed: Pat Quinlan Date: 19/09/22 Review Date: 19/09/25	Page 3 of 13



we gather various types of information about our Data Subjects including information that identifies you as an individual.

5 DATA PROTECTION PRINCIPLES

We will comply with data protection law. This states that the personal information we hold about you must be processed in a lawful, fair & transparent manner, it must be collected only for the purpose that it was intended and only the minimum amount of data should be processed for the specific purpose. Your data must be kept accurate & up-to-date and will be stored for a limited period only. Your personal data will be stored securely and will be processed in a secure and safe manner. And finally, we will be able to account for and be transparent about personal data that we process. This will include completing the necessary documentation as required by GDPR.

6 COLLECTION AND USE OF PERSONAL DATA

Castletroy Golf Club may collect information which you volunteer to us for example by visiting our website, communicating with us via post or email or registering either as a member or visitor. The personal data processed and the reason why it is processed is listed below:

6.1 MEMBERSHIP & ADMINISTRATION

- To allow us to process your application for membership & manage your account we will collect details of your name, address, email, telephone numbers, date of birth, gender, emergency contact name & number, details of membership of other clubs, Golf Ireland number, handicap details, membership type applied for, proposer(s), communication preferences. Where you require login access to software, we will issue you with a set of instructions on how to register on the Golf Ireland, BRS and Club V1 systems.
- Where the applicant is a child, we will collect the following data in order to process their application for cadet/junior membership; name and contact details for the parent/guardian, consent status, name of the child, date of birth, email, school/college, relations attending Castletroy Golf Club and memberships of other sporting clubs, emergency contact details, health data, name & address of the child's Doctor.

Document No	Date	Document owner	Approved by	Page number
CGCPOL0001-22 Version 1 Prepared by Tineke Leonard	19/09/22	Board of Management	Board of Management Signed: Pat Quinlan Date: 19/09/22 Review Date: 19/09/25	Page 4 of 13



- So that we can manage our team of volunteers we will process your name, contact details and volunteer work that you carry out, and committees that you work with.
- To allow us to process data relating to injuries received by active members and accidents that take place at the golf club we may collect health data.
- To allow us to manage booking of rooms for events we will collect the organisers name and address, contact telephone numbers, and email.
- To provide you with a quote for products and services we collect your name, address, contact details & details of products/services quoted for.
- So that we can manage your participation in golf club activities (e.g., book tee times, participate in competitions, attend an event) we will need to process your name, contact details, tee times & booking details, details of your participation in competitions and your golf handicap details.
- To announce & publish results of competitions we will publish your name & handicap results via our online platforms.
- To facilitate the administration of your golf handicap we need to process details of your handicap index and scores.
- If you choose to be allocated a Handicap Index (HI), your golf scores and HI will be made available to other members of this golf club via HowDidIDo, Golf Ireland App and other technology platforms.

6.2 COMMUNICATIONS

- To allow us to communicate with you (e.g., for upcoming events, service notices, send you our newsletter when you subscribe, send product updates or technical alerts if you have opted in) we will process your name, contact details and contact preference whether it be email, telephone or SMS.

6.3 FINANCE MANAGEMENT

- To allow us to process a financial transaction as requested by you (e.g., when you pay your subscription, purchase a product from our shop or pay any other type of fee), we will need to process credit card and/or payment details.

Document No	Date	Document owner	Approved by	Page number
CGCPOL0001-22 Version 1 Prepared by Tineke Leonard	19/09/22	Board of Management	Board of Management Signed: Pat Quinlan Date: 19/09/22 Review Date: 19/09/25	Page 5 of 13



- To allow us to fulfil our legal obligation to manage club finances and prepare annual accounts we will need to keep a record of financial transactions including details of products and services purchased by you.

6.4 MONITORING & SECURITY

- To ensure the safety of members and visitors who visit our golf club we monitor the premises via a CCTV system, therefore recording visual images of you.
- To assess the performance of our website we analyse website users' pattern of use to help us to improve, administer and diagnose problems with our server and website. To do this we may process details of your IP address, the length of time spent on the website and the order in which pages are visited.

Although we do not seek to process sensitive (special category) data we may have to process health data such as in the case of an injury which results in a member not being able to play for a period of time or where there is an emergency situation in terms of an accident which occurs on our premises. With the exception of this type of health data we do not process any other special categories of personal data.

7 CHILDREN'S DATA

We process personal data of children. Under the General Data Protection Regulation & Recital 38, children require specific protection with regard to the processing of their personal data. We will ensure that the necessary technical & organisational measures are in place to achieve this.

For the purpose of data protection law in Ireland, reference to a child shall be taken to be under the age of 18 years. In this respect, a child within this age bracket will fall under our 'junior or cadet membership'. Such details will only be processed with the consent of the parent or guardian.

8 CCTV

Our facility is monitored by CCTV. We use CCTV for the purpose of safety of staff/member/visitors and public safety. These are deemed to be legitimate interests. The CCTV scheme is controlled by Castletroy Golf Club with the assistance of RT Communications

Document No	Date	Document owner	Approved by	Page number
CGCPOL0001-22 Version 1 Prepared by Tineke Leonard	19/09/22	Board of Management	Board of Management Signed: Pat Quinlan Date: 19/09/22 Review Date: 19/09/25	Page 6 of 13



Limerick (our service contractors). Access to recorded material is strictly limited to authorised personnel and is overwritten every 30 days.

9 HOW WE COLLECT PERSONAL DATA

We may collect your data in a variety of ways. The majority of data we collect will be provided directly by you. Other data may be obtained through third parties such as the Golf Ireland.

10 HOW WE STORE DATA

Personal data is stored in both locked filing cabinets and cloud servers. Data stored on designated cloud servers (www.keepitsafe.com) are securely backed up and stored offsite.

Access to such data is based on ‘least privilege’ where there is a controlled access system in place.

Your data will also be stored by data processors acting on our behalf & instruction. Such companies include; Club V1, Howdidido and BRS Golf.

11 IF YOU DECIDE NOT TO PROVIDE PERSONAL DATA

We require certain information from you so that you can avail of our facilities. If you do not provide the personal data that we request it may hinder our ability to provide an effective service to you.

12 LAWFUL BASES FOR PROCESSING

Under data protection law we are required to have an appropriate lawful basis for processing personal data and to advise you of what that basis is. The primary bases used are:

- Processing based on the Data Subject’s consent (e.g., where you give us permission to contact you via email, tel or SMS)
- Processing necessary for the performance of a contract (e.g., where a supplier provides us with their contact details, where you purchase a product or renew your yearly registration)

Document No	Date	Document owner	Approved by	Page number
CGCPOL0001-22 Version 1 Prepared by Tineke Leonard	19/09/22	Board of Management	Board of Management Signed: Pat Quinlan Date: 19/09/22 Review Date: 19/09/25	Page 7 of 13



- Processing that is required under applicable law (e.g., payment details for Revenue purposes)
- Processing that is necessary to protect the vital interests of the Data Subject (e.g., an accident on the golf course which leads to an emergency situation)
- Processing necessary for us to pursue our legitimate interests (e.g., where CCTV is used to monitor our facility for the purpose of keeping our premises and building safe & secure)

Where we process special category data (e.g., health data) we will have an Article 9 (GDPR) lawful basis to process such data.

13 WHO WE SHARE DATA WITH (DISCLOSURE TO THIRD PARTIES)

Where we share data with a third party, we will ensure we have the necessary data sharing or data processing agreements in place. Depending on the purposes for which we collect your personal data, we may disclose it to the following individuals, who will then process your personal data only within the framework of these purposes:

13.1 WITHIN OUR CLUB

- Our authorised staff members
- Our authorised volunteers (e.g. committee members)
- Castletroy's Pro Shop

13.2 THIRD PARTY BUSINESS SUPPLIERS AND/OR DATA PROCESSORS

- Service providers of Castletroy Golf Club: companies that provide services for or on behalf of Castletroy Golf Club, for the purposes of providing such services (e.g., tee sheet booking software providers, Club Management software, IT support service, virtual services & storage services, security company). In such cases we require all

Document No	Date	Document owner	Approved by	Page number
CGCPOL0001-22 Version 1 Prepared by Tineke Leonard	19/09/22	Board of Management	Board of Management Signed: Pat Quinlan Date: 19/09/22 Review Date: 19/09/25	Page 8 of 13



third parties to have appropriate technical and organisational security measures in place to protect your personal data, in line with data protection legislation.

13.3 OTHER THIRD PARTIES

- Golf Ireland, the national governing body for golf in Ireland
- Legal advisors where necessary to protect Castletroy Golf Club
- Castletroy Golf Club Auditors
- To comply with the law, requests from authorities (e.g., An Garda Siochana), court orders, legal procedures, obligations related to the reporting and filing of information with authorities, etc.
- To verify or enforce compliance with Castletroy Golf Club's policies and agreements; and
- To protect the rights, property or safety of Castletroy Golf Club and/or its customers

14 SOCIAL MEDIA & THIRD-PARTY WEBSITES

We use social media platforms such as Facebook, Instagram and Twitter for marketing and information purposes. We may also use these platforms to announce competition results which may include your name and handicap details. These posts may include photographs of presentations and social events. We also include a link to YouTube where your consent is required to view the content.

Links to other websites such as Golf Ireland, the Ireland Golf Tour Operator Association (IGTOA) and our sponsors are also available via our website. Please note these third-party websites and social media platforms (listed above) are not under our control & are governed by their own privacy policies which we advise you to read. We are not responsible for the contents & practices of third-party privacy policies & websites.

15 PHOTOGRAPHS, VIDEOS, TESTIMONIALS

On occasion such as at team matches, prize presentations or social functions, our photographers may be recording the day's events with cameras for upload to social media and the club's

Document No	Date	Document owner	Approved by	Page number
CGCPOL0001-22 Version 1 Prepared by Tineke Leonard	19/09/22	Board of Management	Board of Management Signed: Pat Quinlan Date: 19/09/22 Review Date: 19/09/25	Page 9 of 13



website. This will be made known on the day or evening in question with a general announcement. If you do not wish to be included, please let the photographer know.

16 MARKETING / PROMOTION

We do not actively engage in marketing & promotional campaigns. We do not share your personal data with any third-party marketing companies. We will share your data with our Golf Professional unless you have requested us not to do so.

17 THIRD PARTY SERVICE PROVIDERS/DATA PROCESSORS

Where we engage with service providers (e.g., ClubV1 members hub, BRSGOLF) to provide a service on our behalf, we will ensure there is sufficient technical and organisational measures in place including the appropriate contract/service level agreement and data processing agreement.

18 YOUR DATA PROTECTION RIGHTS

‘You’ as a Data Subject have various rights under data protection law, subject to certain exemptions, in connection with the processing of personal data. They are as follows:

- Right to access your data – the right to request a copy of your personal data, together with other information that we process about you.
- Right to rectification – the right to request that inaccurate data about you is corrected, or incomplete information is completed.
- Right to erasure – the right to request the deletion of your personal data.
- Right to restriction of processing or to object to processing – the right to request that personal data be no longer processed for a particular purpose, or to object to processing of your personal data for particular purposes.
- Right to data portability - the right to request a copy of personal data be provided to the Data Subject or a third party in a structured, commonly used machine-readable format.

Document No	Date	Document owner	Approved by	Page number
CGCPOL0001-22 Version 1 Prepared by Tineke Leonard	19/09/22	Board of Management	Board of Management Signed: Pat Quinlan Date: 19/09/22 Review Date: 19/09/25	Page 10 of 13



- Right not to be subject to a decision based solely on automated decision making, including profiling, which produces legal effects concerning him or her or similarly significant affects.
- Right to make a complaint to the Data Protection Commission.

These rights are not absolute, and some restrictions may apply in certain circumstances. Should a restriction apply, we will inform you of the details of the restriction. You may exercise any of the above rights by contacting us at golf@castletroygolfclub.ie.

We will respond to a valid subject access request within one month of receipt of this request. This can be extended by a further two months where the request is complex or where there are a number of requests from the same individual.

We may request proof of ID should we not be able to verify your ID.

We may, however, charge a reasonable fee, only in limited circumstances as per Article 12(5) GDPR, where a request for information is manifestly unfounded or excessive, particularly if it is repetitive. This fee is based on the administrative cost to provide this information.

19 DATA BREACH MANAGEMENT

If there is ever a data breach including an unauthorised or accidental disclosure of, or access to personal data, alteration of personal data or loss of access to, or destruction of personal data we will adhere to our data breach management plan as set out in our data breach policy & procedure.

20 HOW LONG WE KEEP DATA FOR

We will only retain your Personal Data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

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

Document No	Date	Document owner	Approved by	Page number
CGCPOL0001-22 Version 1 Prepared by Tineke Leonard	19/09/22	Board of Management	Board of Management Signed: Pat Quinlan Date: 19/09/22 Review Date: 19/09/25	Page 11 of 13



whether we can achieve those purposes through other means, and the applicable legal requirements.

We will not store your personal information for any longer than we need to, however we may be obliged by law to store your communications and personal data including activity logs and we may need to show details of these to government or authorised officials upon request. Like many websites, we use log files to monitor the effectiveness of our website.

21 CONFIDENTIALITY & SECURITY

We have strict technical and organisational measures in place to protect the processing of personal data in both hard copy and electronic format, therefore adhering to the requirements of article 32 (GDPR).

Our data processors who have access to, and process personal data as instructed by us are obliged to respect the confidentiality of our staff, members' and visitors' personal data. In such instances we will have the necessary arrangements (e.g., contracts) in place with them.

We ensure that your personal data will not be disclosed to state institutions and authorities except if required by law, other regulation or for funding purposes.

22 TRANSFER OF PERSONAL DATA OUTSIDE OF THE EEA (EUROPEAN ECONOMIC AREA)

While we strive to ensure all personal data is held within the EEA we may, from time to time, make use of services provided by third parties for the delivery/processing of our services which may necessitate the transfer of personal data outside the EU/European Economic Area (EEA). In these circumstances we will ensure that there is a transfer mechanism in place which includes suitably sufficient safeguards to ensure compliance with data protection laws. Examples of such a transfer mechanisms include standard contractual clauses (SCC) or adequacy decision from the EU.

Document No	Date	Document owner	Approved by	Page number
CGCPOL0001-22 Version 1 Prepared by Tineke Leonard	19/09/22	Board of Management	Board of Management Signed: Pat Quinlan Date: 19/09/22 Review Date: 19/09/25	Page 12 of 13



23 TRANSFER OF OWNERSHIP

In the event Castletroy Golf Club goes through a business transition such as a merger, acquisition by another club, or sale of all or a portion of its assets, your personal data will likely be among the assets transferred. Where such activities/transfers take place the ‘acquiring organisation/club’ may continue to use your personal data as set out in this policy.

24 QUESTIONS & COMPLAINTS

Questions about how your personal data is processed can be forwarded to us at golf@castletroygolfclub.ie.

As a Data Subject you also have the right to lodge a complaint with the Data Protection Commission, if you are unhappy with our processing of your personal details. Details of how to lodge a complaint can be found on the Data Protection Commission’s website (www.dataprotection.ie).

If you have any questions or concerns, we encourage you to raise such questions/ concerns with us first, so that we can try to resolve them.

25 CHANGES TO THIS POLICY

We reserve the right to amend this policy from time to time without prior notice. However, we will bring any material amendments to your attention and amendments will not be made retrospectively.

Document No	Date	Document owner	Approved by	Page number
CGCPOL0001-22 Version 1 Prepared by Tineke Leonard	19/09/22	Board of Management	Board of Management Signed: Pat Quinlan Date: 19/09/22 Review Date: 19/09/25	Page 13 of 13