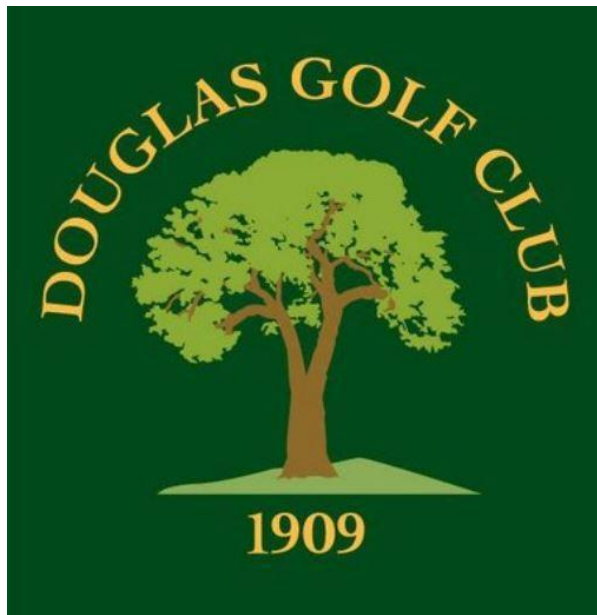
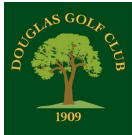


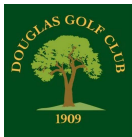


**Douglas Golf Club
Privacy Statement**



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1. Definitions used in this Statement

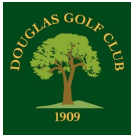
- i. **Douglas Golf Club, Us, We, Our**
 - a. Douglas Golf Club, Us, We & Our all refer to Douglas Golf Club located at Maryborough Hill, Douglas, Cork, T12 AC92 with registered company number 8109147T
- ii. **You**
 - a. You refers to all individuals and organisations that we currently, prospectively or historically process personal data for.
- iii. **Services**
 - a. Our services include but are not limited to:
 - i. Golf Club Membership
 - ii. Events & Functions
 - iii. Bar & Restaurant
 - iv. Professional Shop
 - v. Golf Lessons
 - vi. The website : <https://www.douglasgolf.ie/>
- iv. **Data Protection Officer**
 - a. We have appointed the following individual / organisation to handle all our data protection related queries:
 - i. Enguard Security Limited | 0818 252 052 | info@enguard.ie
- v. **Criminal records**

For the purposes of this policy criminal records data means information about an individual's criminal convictions and offences, and information relating to criminal allegations and proceedings.
- vi. **Data protection laws**

For the purposes of this policy Data Protection laws means all applicable laws relating to the processing of Personal Data, including, for the period during which it is in force, the General Data Protection Regulation (Regulation (EU) 2016/679).
- vii. **Data Subject**

Data subject means the individual to whom the personal data relates.
- viii. **Personal Data**

Personal data means any information that relates to an individual who can be identified from that information



ix. **Processing**

Processing means any use that is made of data, including collecting, storing, amending, disclosing, or destroying it.

x. **Special categories**

Special categories of personal data means information about an individual's racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, health, sex life or sexual orientation and biometric data.

2. Scope of this privacy Statement

- i. This Privacy Statement covers our privacy practices with respect to the processing of your Personal Data.
- ii. For purposes of the applicable Data Protection Laws, Douglas Golf Club is the "data controller". This means that Douglas Golf Club determines the purposes for which, and the manner in which your Personal Data is processed.
- iii. This privacy statement describes the information that we collect about you, how we obtain your personal information, and how we may use or disclose that information in connection with the delivery of our services to you or your employment with us. This Privacy Statement also describes the measures we take to protect the security of your personal information and how you can contact us about our privacy practices, including to exercise your privacy rights.

3. Data we may collect

- i. We may collect the following Data, which includes personal Data, in each case, in accordance with this privacy Statement from you:
 - a. Data we may collect:
 - i. Member's name, address, telephone numbers, email address/s.
 - ii. Emergency contact details
 - iii. Date of birth / age related information
 - iv. Gender
 - v. The Member's name and handicap
 - vi. Photos and videos of Members and their guests
 - vii. The Member's name, email address and telephone number
 - viii. GUI Membership ID Details
 - ix. Original records of application and appointment including CV, Contract of Employment, Interview notes, Previous employer references etc.;
 - x. Details of approved absences (career breaks, parental leave, study leave etc.);
 - xi. Details of work record;



- xii. Details of any accidents/injuries sustained on the organisation's property; and
- xiii. Financial & Revenue details required to facilitate payroll

4. How we may collect Data

- i. We may collect Data in the following ways:
 - a. Data is given to us by you;
 - b. Data is received from other sources; and
 - c. Data may be collected automatically.

5. Data that is given to us by you

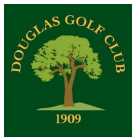
- i. Douglas Golf Club may collect your Data in a number of ways, in each case, in accordance with this privacy statement, for example:
 - a. When you contact us through the Website, by telephone, post, email or through any other means;
 - b. When you receive our products/services;
 - c. When you are employed by us;
 - d. When you enter into a contract with us;

6. Data that may be received from third parties and publicly available sources

- i. Douglas Golf Club may receive Data about you from third parties and publicly available sources in each case, in accordance with this privacy statement that we require in order to deliver our service to you or offer employment to you

7. Data that may be collected automatically

- i. To the extent that you use our services we may collect your Data automatically, for example:
 - a. We may automatically collect some information about your visit to our Website. This information helps us to make improvements to Website content and navigation, and includes your IP address, the date, times and frequency with which you access the Website and the way you use and interact with its content.
 - b. We may collect your Data automatically via cookies, in line with our cookie statement and settings on your browser. For more information about cookies,



and how we use them on the Website, see our website Terms of Use and Cookie Statement

8. Our use of Data

- i. Any or all of the above Data may be required by us from time to time in order to provide you with the best possible experience when using our Services as a Member / Visitor or employed by us as a member of our Staff.
- ii. Specifically, Data may be used by us in each case, in accordance with this privacy Statement for the following reasons:
 - a. The management and administration of our organisation;
 - b. Facilitating the delivery of our services and or products;
 - c. Human resources management;
 - d. For compliance with legislation relevant to the organisation.

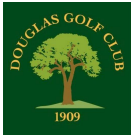
We may use your Data for the above purposes if we deem it necessary to do so for our legitimate interests. If you are not satisfied with this, you have the right to object in certain circumstances (see the section headed "Your rights" below).

9. Who we share Data with

- i. We may share your Data with the following organisations to deliver, maintain & improve our service in each case, in accordance with this privacy Statement for the following reasons:
 - a. Any of our group companies or affiliates
 - b. Our staff, consultants and/or professional advisors
 - c. Third party service providers who provide services to us which require the processing of personal data
 - d. Relevant authorities

10. Keeping Data secure

- i. We will use technical and organisational measures to safeguard your Data, for example:
 - a. Our staff are governed by a strictly enforced data protection policy.
 - b. Our systems are configured, maintained and monitored to ensure the best possible technical measures we can achieve. These have been implemented to secure your data.



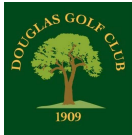
- c. Technical and organisational measures include measures to deal with any suspected data breach. If you suspect any misuse or loss or unauthorised access to your Data, please let us know immediately by contacting us.

11. Data retention

- i. Unless a longer retention period is required or permitted by law, we will only hold your Data on our systems for the period necessary to fulfil the purposes outlined in this privacy Statement or until you request that the Data be deleted.
- ii. Even if we delete your Data, it may persist on backup or archival media for legal, tax or regulatory purposes.

12. Your rights

- i. You have the following rights in relation to your Data:
- ii. **Right to be informed**
 - a. You have the right to be informed of how we process your data. We comply with this right through the issuing of this Privacy Statement.
- iii. **Right to access**
 - a. The right to request
 - i. Copies of the information we hold about you at any time, or
 - ii. That we modify, update or delete such information.
 - b. If we provide you with access to the information, we hold about you, we will not charge you for this, unless your request is "manifestly unfounded or excessive." Where we are legally permitted to do so, we may refuse your request.
 - c. If we refuse your request, we will tell you the reasons why.
 - d. To invoke your right to access please request our Subject Access Request form to complete and return to us.
- iv. **Right to rectification**
 - a. The right to have your Data rectified if it is inaccurate or incomplete.
- v. **Right to erase**
 - a. The right to request that we delete or remove your Data from our systems.
- vi. **Right to restrict our use of your Data**
 - a. The right to "block" us from using your Data or limit the way in which we can use it.
- vii. **Right to data portability**
 - a. The right to request that we move, copy or transfer your Data.
- viii. **Right to object**



- a. The right to object to our use of your Data including where we use it for our legitimate interests.
- ix. **Rights related to automated decision making and profiling.**
 - a. You have rights related to automated decision making and profiling, however this is not a type of processing activity that we as an organisation engage in.
- x. To make enquiries, exercise any of your rights set out above, or withdraw your consent to the processing of your Data (where consent is our legal basis for processing your Data), please contact us.
- xi. If you are not satisfied with the way a complaint you make in relation to your Data is handled by us, you may be able to refer your complaint to the relevant data protection authority.
- xii. It is important that the Data we hold about you is accurate and current. Please keep us informed if your Data changes during the period for which it is held.

13. Transfers outside the European Economic Area

- i. Data which we may collect from you may be stored and processed in and transferred to countries outside of the European Economic Area (EEA).
 - a. For example, this could occur if our servers are located in a country outside the EEA or one of our service providers is situated in a country outside the EEA.
 - b. We also share information with our third party service providers, some of which are located outside the EEA.
- ii. We will only transfer Data outside the EEA where it is compliant with data protection legislation and the means of transfer provides adequate safeguards in relation to your data,
 - a. E.g. by way of data transfer agreement, incorporating the current standard contractual clauses adopted by the European Commission, or by signing up to the EU-US Privacy Shield Framework, in the event that the organisation in receipt of the Data is based in the United States of America.
- iii. To ensure that your Data receives an adequate level of protection, we have put in place appropriate safeguards and procedures with the third parties we share your Data with.
 - a. This ensures your Data is treated by those third parties in a way that is consistent with the Data Protection Laws.

14. Changes of organisation structure and control



- i. Douglas Golf Club may, from time to time, expand or reduce our organisation and this may involve the transfer of control of all or part of Douglas Golf Club.
- ii. Data provided by clients will, where it is relevant to any part of our organisation so transferred, be transferred along with that part. The new owner or newly controlling party will, under the terms of this Privacy Statement, be permitted to use the Data for the purposes for which it was originally supplied to us.
- iii. We may also disclose Data to a prospective controller of our organisation or any part of it.
- iv. In the above instances, we will take steps to ensure your privacy is protected.

15. General

- i. You may not transfer any of your rights under this Privacy Statement to any other person.
 - a. We may transfer our rights under this privacy Statement where we reasonably believe your rights will not be affected.
- ii. If any court or competent authority finds that any provision of this privacy Statement (or part of any provision) is invalid, illegal or unenforceable, that provision or part-provision will, to the extent required, be deemed to be deleted, and the validity and enforceability of the other provisions of this privacy Statement will not be affected.
- iii. Unless otherwise agreed, no delay, act or omission by a party in exercising any right or remedy will be deemed a waiver of that, or any other right or remedy.
- iv. This Agreement will be governed by and interpreted according to Irish Law. All disputes arising under the Agreement will be subject to the exclusive jurisdiction of the Irish courts.

16.Changes to this privacy Statement

- i. Douglas Golf Club reserves the right to change this privacy Statement as we may deem necessary from time to time or as may be required by law.
- ii. You may contact Douglas Golf Club with any queries in relation to this Privacy Statement.