Data Protection Policy

Hertfordshire Golf Limited is registered with the Information Commissioner's Office (ICO) under the Data Protection Act 2018.

General Statement of Hertfordshire Golf's Duties and Scope

Hertfordshire Golf is required to process relevant personal data regarding members of staff, volunteers, golf club members, parents, junior golfers and their siblings, and others as part of its operation and shall take all reasonable steps to do so in accordance with this Policy.

Definitions

- 'Data Subject', an individual who is the subject of the personal data.
- 'Data Processor', any individual collecting, storing, retrieving or using personal data.
- 'Hertfordshire Golf' is Hertfordshire Golf Limited; a private company limited by guarantee incorporated on 20 October 2017, and additionally covers any associated bodies under the control of the company where the Data Protection Act applies. It does not include any golf clubs that are affiliated to the company.
- Parental consent includes the consent of a guardian.

Data Protection Controller

Hertfordshire Golf has identified the County Secretary as the Data Protection Controller (DPC) who will endeavour to ensure that all personal data is obtained and processed in compliance with this Policy and the Principles of the Data Protection Act 2018. The Freedom of Information Act 2000 and the Protection of Freedoms Act 2012 are also relevant to parts of this policy.

Hertfordshire Golf recognises The General Data Protection Regulation (GDPR) (Regulation (EU) 2016/679) adopted 27 April 2016 as well as any relevant UK legislation enacted as a consequence of exiting the European Union, and is actively working towards compliance with that directive.

The Principles

Hertfordshire Golf shall so far as is reasonably practicable comply with the Data Protection Principles (the Principles) contained in the Data Protection Act to ensure all data is: -

- Fairly and lawfully processed;
- Processed for a lawful purpose;
- Adequate, relevant and not excessive;
- Accurate and up to date;

- Not kept for longer than necessary;
- Processed in accordance with the data subject's rights;
- Secure;
- Not transferred to other countries without adequate protection.

Personal Data

Personal data covers both facts and opinions about an individual where that data identifies an individual. For example, it includes information necessary for employment such as the employee's name and address and details for payment of salary or team members' attendance records and playing results.

Data Processor

Anyone collecting, storing, retrieving or using personal data on behalf of Hertfordshire Golf is a Data Processor and must abide by this policy.

Processing of Personal Data

Consent may be required for the processing of personal data unless processing is necessary for the performance of the contract of employment. Any information which falls under the definition of personal data and is not otherwise exempt will remain confidential and will only be disclosed to third parties with appropriate consent.

Parents' consent to process and disclose junior golfers' data will be considered to imply consent of that individual when they reach the age of 18. If a junior golfer wishes to revoke or change consent upon attaining the age of 18, they must make a specific agreement on how their data is to be processed with the data processor. Hertfordshire Golf will make all reasonable efforts to obtain the personal consent of juniors once they reach the age of 18.

In some cases, specific partner organisations may publish a detailed privacy policy relating to their services. Use of those services indicates acceptance and may grant additional consent as to how Hertfordshire Golf may process personal data.

Hertfordshire Golf may process some personal data for direct marketing or fund-raising purposes, data subjects have the right to opt-in to these activities, which must be respected.

Sensitive Personal Data

Hertfordshire Golf may, from time to time, be required to process sensitive personal data. Sensitive personal data includes data relating to medical information, gender, religion, race, sexual orientation, trade union membership and criminal records and proceedings.

Rights of Access to Information

Data subjects have the right of access to information held by Hertfordshire Golf, subject to the provisions of the Data Protection Act 2018 and the Freedom of Information Act 2000. Any data subject wishing to access their personal data should put their request in writing to the County Secretary.

Hertfordshire Golf will endeavour to respond to any such written requests as soon as is reasonably practicable and, in any event, within 40 days for access to records and 21 days to provide a reply to an access to information request. The information will be imparted to the data subject as soon as is reasonably possible after it has come to Hertfordshire Golf's attention and in compliance with the relevant Acts.

Exemptions

Certain data is exempted from the provisions of the Data Protection Act which includes the following: -

- National security and the prevention or detection of crime;
- The assessment of any tax or duty;
- Where the processing is necessary to exercise a right or obligation conferred or imposed by law upon Hertfordshire Golf, including Safeguarding and prevention of terrorism and radicalisation.

The above are examples only of some of the exemptions under the Act. Any further information on exemptions should be sought from the ICO.

Accuracy

Hertfordshire Golf will endeavour to ensure that all personal data held in relation to all data subjects is accurate. Data subjects must notify the data processor of any changes to information held about them. Data subjects have the right in some circumstances to request that inaccurate information about them is erased. This does not apply in all cases, for example, where records of mistakes or corrections are kept, or records which must be kept in the interests of all parties to which they apply.

Enforcement

If an individual believes that Hertfordshire Golf has not complied with this Policy or acted otherwise than in accordance with the Data Protection Act, the member of staff should utilise Hertfordshire Golf grievance procedure and should also notify the County Secretary.

Data Security

Hertfordshire Golf will take appropriate technical and organisational steps to ensure the security of personal data.

All employees and volunteers will be made aware of this policy and their duties under the Act.

Hertfordshire Golf and therefore all employees and volunteers are required to respect the personal data and privacy of others and must ensure that appropriate protection and security measures are taken against unlawful or unauthorised processing of personal data, and against the accidental loss of, or damage to all personal data.

An appropriate level of data security must be deployed for the type of data and the data processing being performed. In most cases, personal data must be stored in appropriate systems and all reasonable steps taken to ensure its security, especially

when used offsite. Other personal data may be for publication or limited publication within Hertfordshire Golf, therefore having a lower requirement for data security.

External Processors

Hertfordshire Golf must ensure that data processed by external processors, for example, service providers, Cloud services including storage, web sites, etc. are compliant with this policy and the relevant legislation.

Retention of Data

Hertfordshire Golf may retain data for differing periods of time for different purposes as required by statute or best practices, individual employees, team managers, committees and partners will incorporate these retention times into their processes and procedures. Other statutory obligations, legal processes and enquiries may also necessitate the retention of certain data.

Hertfordshire Golf may store some data such as awards, photographs, results, achievements, etc. indefinitely in its archive.

Secure Destruction

When data held in accordance with this policy is destroyed, it must be destroyed securely in accordance with best practice at the time of destruction.

The overall responsibility for this policy lies with the Board.

Responsible Person: County Secretary
1st Adopted: 19 March 2019
Version Adopted: 21 January 2025
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