



**Walmersley Golf Club**

**Privacy Policy**

# PRIVACY POLICY

**This Privacy Policy refers to Walmersley Golf Club.**

The registered office is: Walmersley Golf Club, Garretts Close, Bury, BL9 6TE  
This policy (together with our terms and conditions of membership and any other documents referred to in this policy) explains how we will collect, process, use and protect any personal data which we collect from you or that you provide to us.

## YOUR PERSONAL INFORMATION

We may collect and process the following data about you:

- Certain personal information such as your name, postal and email addresses, telephone number(s), payment information and/or a user name and password.
- Information provided at the time of membership
- Information about your booking and/or use of our venues.
- Records of correspondence.
- Location data, which your mobile device provides if you consent.

## ACCEPTANCE OF TERMS

By submitting information to us or using our Website or registering for services through the Website, you agree to accept the data protection practices outlined in this Privacy Policy and consent to our collecting and processing your personal data in accordance with this Privacy Policy.

## USE OF YOUR INFORMATION

We may use the information that you provide or that we collect for the following purposes:

- To set up and manage your membership and to administer our services;
- To take advice and action in relation to the collection of debts;
- To provide any services or information you have requested, including through the use of email and text message where appropriate;
- To notify you about our products, services or special offers that may be of interest to you;
- To detect and protect against error, fraud or other criminal activity;
- To enforce our terms and conditions of use including carrying out security reviews to validate your identity, age, contact details and financial information; or in any other way as described to you at the time of collection of your personal data.

The basis for collecting this data is as follows:

- Contract: to fulfil a contract customer information is needed for WGC to successfully produce and deliver the agreed services.
- Legitimate interest: where WGC contacts existing customers with promotional

activities.

- Consent: clear and explicit consent is required for marketing purposes.
- We may have legal obligations where data can be provided to authorities if criminal activity is carried out, e.g. CCTV footage.

We, together with our external suppliers, may also use your data to assist us in providing you with details of our services.

If you do not want us to contact you with details of our special offers, products or services that we think you might be interested in please tick the relevant box on any registration form or contact us at the address below.

## **DISCLOSURE OF YOUR INFORMATION**

We value your privacy and do not sell your information to any third parties under any circumstances.

We may include announcements from partners or other third parties in some communications, but we do not provide any of your personal data to third parties, except where required by law.

We may give information about you to the following, who may use it for the same purposes as set out above:

- To mailing houses, our marketing agencies, SMS/email systems provider and other distributors for the distribution of information to you;
- To suppliers who profile your data so that we may tailor the goods/services we offer to your specific needs;
- If we have a duty to do so or if the law allows us to do so. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction;
- To third parties who will help process or administer our services or who will provide advice and take action in relation to the collection of debts.

## **COMMUNICATING WITH YOU**

We only send email or text messages to individuals who have requested that these mailings be sent to them, or as part of an ongoing relationship we have with an individual or business.

Your right to control what communications, if any, that you receive is important to us. The information below will assist you in understanding the different communications options you have, and how you can notify us of changes in your preferences or to unsubscribe in general.

If we provide notifications to Members including, without limitation, course closures, class cancellations, membership terms or bookings changes, these notifications may be made by telephone or sent by email, text message, post or any other appropriate means.

We maintain a list of people who have expressed an interest in receiving updates about local venue events, special promotions and offers. These can be sent by email, post or text message according to your preferences. You can subscribe to these

updates at any time, and unsubscribe by following the instructions within any electronic communication.

## **ON-LINE BOOKING**

We may will use email and/or text messaging to communicate with you if you use our Online Booking Service to make a payment online. Please see our Online Booking Service terms and conditions for further details.

You can update your communications preferences at any time by following the links located within any electronic communication from us.

## **COOKIES**

When you visit one of our websites or mobile applications, we may send you a cookie. A cookie is a small file that can be placed on your computer's hard disk or mobile device for record keeping purposes and we may use them to do a number of things:

Cookies help us to recognise you when you next visit one of our websites and note the advertisements displayed to you. This allows us to tailor the advertisements we provide to your preferences. We may use the services of third party ad servers for this purpose.

Cookies may be used to compile anonymous statistics related to the take up or use of services, or to patterns of browsing. A third party collects such data on our behalf to measure web site performance. Information collected is aggregated for reporting purposes. No personally identifiable information is collected by this service. The use of this service assists us in measuring and improving the structure and ease of use of our websites.

If you do not wish to use cookies, you may de-activate cookies in your web-browser or reject the creation of cookies. You may wish to seek technical assistance from your browser provider if you do not know how to do this. We cannot be responsible for any technical faults or failures to your system.

## **ACCESS TO INFORMATION**

You have the right to make a written request for a copy of the personal data that we keep about you. If you would like to know what personal information we hold, or would like us to correct any of the details we hold about you, you should write to or call the General Manager at the address of the location concerned.

We will ask you to enclose proof of your identity, such as a copy of your passport or driving licence. You will have to give us enough information so we can identify the personal information you have asked to see or have corrected. We do not have to respond to your request until you have given us this information.

We will contact you within one month of you asking to see your records or, where we have asked for further information to identify you, within one month of receiving such information.

Under Article 17 of the GDPR you also have the right to have personal data erased. Please contact us using the details below to request this.

## **CHANGES TO THIS PRIVACY POLICY**

We reserve the right to update, modify or change this Privacy Policy at any time. Any such changes will be posted here. If you continue to use our services after we have changed this Privacy Policy, you thereby consent to be bound by any such changes.

## **SECURITY**

In order to comply with our obligations under GDPR, we will protect your personal data from unauthorised access, misuse, alteration or loss by using commercially reasonable security measures.

While the transmission of information via the internet is not completely secure we have procedures and security in place to keep personal data secure once it is in our systems.

We store personal data in digital format on secure servers and systems and access to personal data is highly restricted internally for approved business purposes only. Any personal data collected in paper form (e.g. surveys, business cards, etc.) are securely held at our office location in the UK.

You should ensure that you use appropriate virus checking software and firewalls. Where we have given you a password which enables you to access certain parts of our websites, you are responsible for keeping this password confidential. We ask you not to share your password with anyone.

Whilst we take all reasonable steps to ensure that the websites continue to be available there may be times when they are not available. This may be for reasons relating to the maintenance of, or alterations to, the websites or for reasons beyond our control. We are not responsible to you if the websites are unavailable. We use a third party service to help maintain the security and performance of our websites. To deliver this service it processes the IP addresses of visitors to our websites.

We won't share your personal information with any 3rd party organisation for market research, marketing, or commercial purposes without specific consent.

We operate a retention period policy in which we will not hold the data for longer than necessary.