

## Data Privacy Notice for Members

Millicent Members Golf Club is a services provider of Golf and related services. Millicent Golf Club (“we” or “us” or “our”) refers to Millicent Members Golf Club it’s legal entity collecting members data at Millicent Golf Club, Millicent, Clane, Co Kildare. Millicent Golf Club’s data is managed by our administrative assistant, contact: [info@millicentgolfclub.com](mailto:info@millicentgolfclub.com)

### 1.1 Legal reasons for processing your personal data:

We are committed to protecting and processing your personal data and we are required to do so by law. It is necessary for us to use your personal data so that we can provide you with the following services.

- 1. Membership Registration and related handicap and competition services.**
- 2. Managing Teams**
- 3. Financial Services**
- 4. Marketing and communication purposes – text and Email, Social Media and Millicent Webpage.**

1.2 The Data Protection legislation applies to personal data relating to living individuals is collected and used for membership registration, managing teams and administering the club. These are legitimate uses of the data, but it is imperative that the data is controlled and processed in compliance with the legislation.

### Data we process:

During your membership with us, we obtain your personal data from three sources: (1) from you, (2) from others and (3) from our governing authority Golf Ireland.

- (1) we ask you to provide us your basic personal data (especially your personal identification data), your payment and insurance data (data necessary in order to pay for our service) and your health data (Junior Members, only as deemed necessary for the wellbeing of the members).

### How long we retain your data for:

Millicent Golf Club retains your personal data for a period necessary to provide Golfing and related services and to comply with applicable Legislative, tax, accounting or other legislative requirements. If our legal obligation to retain your data ends, we will delete your data.

For further information about how long we keep your data, please see the Annex of this notice or contact our administration assistant by emailing - [info@millicentgolfclub.com](mailto:info@millicentgolfclub.com).

### 1. Who we share your data with:

During your membership contract with us, we share your personal data with three different types of recipients: (1) with providers instructed by us, (2) with providers independent from us and (3) with people you request us to share data with.

(1) Millicent uses service providers (so-called data processors) to assist us in processing the personal information we receive and create (for example financial software and hardware vendors, Golf Handicap software provider Golf Ireland and our Insurers. The data processors act on behalf of Millicent on our written instructions. We only share your data that is absolutely necessary.

(2) We share your personal data with third parties (meaning recipients independent from us) in the following instances:

- a) If we are required by law.
- b) If needed to perform our obligations with a financial institution or golfing governing body.
- c) If the protection of your vital interest so requires, we will share your health data (where provided) with medical professionals.

(3) If you wish to ask us to share your data with someone, we kindly suggest enquiring about how and why this person would process your personal data first. The processing activities of third-party recipients are outside our control and responsibility.

For further information about the recipients of your personal data please see the Annex of this notice or contact our administration assistant at [info@millicentgolfclub.com](mailto:info@millicentgolfclub.com)

### 2. Keeping your data safe:

Keeping your data safe is our priority. Your personal data is stored securely by us, or by our carefully selected service providers. When our service providers process data on our behalf, we require a high level of protection.

We make sure that very strict security measures are in place to keep your personal data safe against loss and misuse, as well as unauthorized access or transfer.

### **3. Your rights**

Under data protection legislation you have the following rights.

- 3.1. *Right to request access to your personal data.* This means that you are entitled to know that your data is being processed and you are entitled to access your personal data processed by us and to being provided with information about what Affidea does with your personal data.
- 3.2. *Right to request rectification of your personal data.* This means that you are entitled to have your personal data corrected or completed if it is inaccurate or incomplete.
- 3.3. *Right to request erasure of your personal data.* This means that you are entitled to have your personal data deleted in specific circumstances if there is no lawful reason for continuation of processing.
- 3.4. *Right to request from us restriction of processing.* This means that you may request to 'block' the processing of your personal data. Your valid request will mean that we will be allowed to store your personal data, but not to process it further.
- 3.5. *Right to data portability.* It allows you to access and reuse your personal data that you have provided us for your own purposes across different services. You are entitled to receive and transfer an electronic copy of your personal data easily and to ask us to transfer it to another controller.
- 3.6. *Right to object* to the processing of your personal information for direct marketing purposes.

If you wish to use your rights or wish to have further information about your rights above, please contact our Data Protection Officer (you can see the contact details below).

### **4. If you have any questions**

If you have any questions or would like more information, please feel free to contact our administrative assistant (e-mail: [info@millicentgolfclub.com](mailto:info@millicentgolfclub.com) postal address: Millicent Golf Club, Millicent, Clane, Co. Kildare telephone number: 045 893279 If you are unhappy with the way we process your data, you can make a complaint to the Supervisory Authority [www.dataprotection.ie](http://www.dataprotection.ie) However, we would of course hope that you are able to raise any issues with us in the first instance.

**Annex to Data Privacy Notice**  
**For management of members data in the course of Golf Club Management**

Below you can find further information about who we share your data with. We only share your data with other recipients if it is absolutely necessary.

Data recipients acting on behalf of (and instructed by) Millicent Golf Club					
Industry	Sector of activity	Sub-Sector of activity	Type of activity	Identity / Location of the recipient	
Service Providers	Administration	Men's Committee Ladies Committee Executive Committee	Scheduling of competitions Scheduling of Interclub team events Management of the activities of the Golf Club	Millicent Golf Club	
Marketing	Promotion	Newsletters Social Media	Sending newsletters, if you consented to our marketing activity	Eircom	
	Membership Database management	Data Storage	Storing of members / Societies contact information, if you consented to our marketing activity	BRS Golf Ireland	
Information Technology	Electronic communication	E-mails Text messages	Operation and Hosting of E-mail system	Eircom Google mail	
	Administration Software	Handicap management	Storing members data for competition and handicap purposes On line booking service	Handicap Master BRS	
	Financial Software Supplier	Accounting	Billing of membership costs Billing of Insurance Billing of Bar Levy		
	Operation	Operation of IT infrastructure	Ensuring availability of data		
	Support	User Support	System support	Ensuring availability of systems Software maintenance	Handicap master
		Data Storage	Back-up of data	Securing availability of data	
Security	Monitoring premises	CCTV operation	Video recording		

Third party data recipients (acting independently from Millicent Golf Club)				
Industry	Sector of activity	Sub-Sector of activity	Type of activity	Identity of the recipient
Financial institution	Bank	Payment	Payment processing by credit or debit card	AIB
Public Authorities	Garda	Vetting	Exercise of investigating power Legislative Garda Vetting relating to Junior members	Garda Vetting Unit Ennis
Insurance	Service Insurance	Injuries/ Incidents	In case of a claim filed by you or another service user in the event of an incident.	
Audit	External Audit Organization	Health and Safety Data compliance	examination of quality standards	Data Commissioner, EPA, CGI ( child protection)
	Certified public accountant	-	examination of books of accounts	
Communication	Postal services	-	Delivery of letters	AN POST
	Telephone services	-	Operation and Hosting Telephone system	EIRCOM

Below you can also find further information about the type of data we process for the various purposes (as outlined in section 1.1-1.3. of the Notice) and about how long do we keep your data for.

Personal data processed				
Purpose of our data processing	Personal Data Type	Examples of Personal Data	Reasons for Processing	Retention period
medical service	Basic Personal Data	Name, Mobile number, Address, email address DOB, NOK	Management of timesheets and competitions, keeping contact with members,	8 YEARS
	Financial and Insurance Details	Proof of Insurance Cover, Credit Card data	Financing and payment	6 YEARS
	Medical Data	Diagnosis	Junior members safety when not accompanied by a parent/guardian as required,	Adult: 8 years Children: 8 years from turning 21 and last episode of care
	Other personal data			As above
General marketing	Basic Personal Data	Name, Mobile number, Address, email address	Sending general promotional information to you	Until the retention period as detailed above