

**The General Data Protection Regulation (GDPR)**, which came into effect on 25 May 2018, creates consistent data protection rules across Europe. It applies to all companies that process personal data about individuals in the EU, regardless of where the company is based. Processing is defined broadly and refers to anything related to personal data, including how a company handles and manages data, such as collecting, storing, using and destroying data.

We have created this Privacy Policy to demonstrate that we comply with current EU data protection law and the GDPR. This Privacy Policy describes how the Club collects information from members using its services, those that visit the club but are not members (guests), what we do with the information we collect, and the choices members and guests have concerning the collection and use of such information. We request that you read this Privacy Policy carefully.

## **Definitions:**

In this policy, "we", "us", "our" "committee" and "Club" refer to Wethersfield Club, Old Mill Chase, Wethersfield, Braintree CM7 4EB.

Data Subject - a natural person whose personal data is processed by a controller or processor.

Data Controller - the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data.

We (Wethersfield Club) are the data controller for the purposes of this policy, the Data Protection Act 1998 and the EU General Data Protection Regulation (the 'GDPR').

## **1. Introduction**

**1.1.** We are committed to protecting the personal data that we hold and use and to respecting your privacy.

**1.2.** This policy and other documents that we may refer to within this policy describes the data that we collect from you or about you, and the way we use it.

**1.3.** This policy applies where we are acting as a data controller; in other words, where we are determining where and how we use the personal data you provide to us.

Data Processor - a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller.

Where personal data is provided directly to us by the data subject by registering for membership and/or services or by registering for events, competitions or marketing updates or by any other means where we are determining the way in which that personal data is being processed for our own use, then we (Wethersfield Club) will be the data controller of such information.

Otherwise we will act as the data processor for all other personal data provided by a data controller and require this data to fulfil the delivery contract and meet legal obligations only.

## **2. How we use your personal data**

In section 2 we describe:

- A. The types of data we may collect and/or process.
- B. The source of data we may collect.
- C. The purposes for which we may process that personal data and the legal basis of that processing.

### **2.1. The types of personal data we may collect:**

- A. Personal data that you voluntarily provide to us such as; your name, address, telephone number, date of birth and email address.

- B. Technical data about how you use our services. This may include your product selection or frequency and duration of your visits.
- C. Transaction data, including your credit or debit card details for the purpose of completing a transaction to use our services.
- D. Correspondence data, such as transcripts of any conversations you may have with us.

## 2.2. The source of data we may collect:

Data we collect may be from one of the following sources:

- A. Directly from you: Information you voluntarily provide when using our services. For example, when you establish or renew your membership, buy a product, hire the club’s premises, leave a review or contact the committee or its staff.
- B. From other sources: We work closely with third parties providing services to us, and we may receive information about you from them, for example:
  - i. Sub-contractors providing services facilitating payment.
  - ii. Social networking platforms.

## 2.3 The purposes for which we may process that personal data and the legal basis of that processing:

We may use your data for a variety of purposes related to the products and services we provide. The legal basis for such processing is set out below:

<b>Why we use your data</b>	<b>Lawful Basis</b>		
	<b>To perform</b>	<b>To comply with</b>	<b>To pursue</b>

	<b>our contract with you</b>	<b>legal obligations</b>	<b>legitimate interests</b>
To provide our services to you.	X		
To verify your identity and membership status.	X	X	X
To deal with enquiries or complaints you have.	X		X
To make improvements to services we provide.			X
To let you know about important changes to our policies.			X
Management purposes such as accounting, or auditing.		X	X
To ensure the information we hold about you is up to date.		X	X
For advertising and marketing purposes.			X

### **3. How we share your data:**

We will never sell, rent or swap your personal data or give it to anybody else for them to use for their own purposes without making that clear to you. There are however various ways in which we will share your data:

**3.1.** We may disclose your personal data to suppliers and contractors insofar as it is reasonably necessary and on the legal basis set out in section 2.3 of this policy.

**3.2.** We may disclose your personal data to payment service providers in order to process payment for services or otherwise insofar as it is reasonably necessary and on the legal basis set out in section 2.3 of this policy.

**3.3.** We may disclose your data to other clubs, societies or public houses associated with the club's social activities, though only where those activities concern a member specifically. e.g. pool and dart leagues.

**3.4.** We may disclose your personal data where necessary for compliance with our own legal or regulatory obligations or to establish, exercise or defend our legal rights.

**3.5.** International transfer of your data: Although it is unlikely that we would need to do so, whenever we may send (or permit a third party) to send your data outside of the EEA, we will take the necessary steps to protect your data as is required by law, though we may also rely on service providers or contractors to adhere to certain compliance programmes overseas.

### **4. Security & retention of your personal data:**

**4.1.** We take data security very seriously. We have implemented various strategies, controls and measures to protect and keep your data secure and regularly review those measures. For example:

- A. All payment card data is protected in accordance with the industry approved security controls, the Payment Card Industry ("PCI") Data Security Standard.

- B. Printed data is kept locked in the club safe and accessible to the committee and its senior staff only.
- C. Digital data is kept secured on password protected computers and accessible to the committee and its senior staff only.

**4.2.** We will only retain your data for as long as is necessary for the purposes outlined in this policy. The periods for which we retain data vary according to the type of data and the purpose for which we originally collected it. For example, certain transaction data may be retained for many years to comply with our legal obligations, and other data may be kept for a different period to provide the contracted services and stored until such time that all and any claims and legal disputes have been settled and there is no direct risk of fraudulent activity from erasing the data.

Our internal data retention policy is regularly reviewed. Once a retention period has elapsed any data held is deleted securely.

## **5. Your Rights:**

The law gives you a number of rights to your personal data and our use of it. You have the right:

**5.2.** To see what personal data we hold about you and find out how we process the data.

**5.3.** To ask us to update personal data we hold about you.

**5.4.** To ask us to delete your personal data (right to erasure) either in whole or in part, without unnecessary delay. However, we reserve the right to retain data where necessary for us to complete our regulatory or other legal compliance obligations.

N.B. Total erasure of an individuals' data will void that individuals' club membership.

**5.5.** To ask us to stop using your data if you don't believe we have a right to use it.

If at any time you wish to exercise your rights as detailed above (or have any questions about this privacy policy) you can contact the club using the details outlined in section 6 of this policy.

You also have the right to complain about our use of your personal data. You may do so in the EU member state that you live, your place of work or the place of the alleged infringement.

## **6. How to contact us:**

If you have any questions or concerns regarding your personal data, you are welcome to contact us by:

**6.1.** Post, to Wethersfield Club, Old Mill Chase, Wethersfield, Braintree, CM7 4EB

**6.2.** Email at [wethersfieldsocialclub@gmail.com](mailto:wethersfieldsocialclub@gmail.com)

## **7. Amendments to this policy:**

**7.1.** We may update this policy from time to time. All revisions will be published online at <http://www.wethersfieldclub.co.uk>

**7.2.** We may email you to inform you of changes to this policy, though you should check our website occasionally for any updates or changes.