

<p>CCL LTD Data Protection Policy May 2018</p>

1. Introduction

This Policy sets out the obligations of CCL Ltd (“the Company”) regarding data protection and the rights of clients in respect of their personal data under the General Data Protection Regulation (“the Regulation”).

The Regulation defines “personal data” as any information relating to an identified or identifiable natural person (a data subject); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier, or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural, or social identity of that natural person.

This Policy sets out the procedures that are to be followed when dealing with personal data. The procedures and principles set out herein must be followed at all times by the organisation, its employees, agents, contractors, or other parties working on behalf of the organisation.

The organisation is committed not only to the letter of the law, but also to the spirit of the law and places high importance on the correct, lawful, and fair handling of all personal data, respecting the legal rights, privacy, and trust of all individuals with whom it deals.

2. The Data Protection Principles

This Policy aims to ensure compliance with the Regulation. The Regulation sets out the following principles with which any party handling personal data must comply. All personal data must be:

- a) processed lawfully, fairly, and in a transparent manner in relation to the data subject;
- b) collected for specified, explicit, and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be considered to be incompatible with the initial purposes;
- c) adequate, relevant and limited to what is necessary in relation to the purposes for which it is processed;
- d) accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that is inaccurate, having regard to the purposes for which they are processed, is erased or rectified without delay;
- e) kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data is processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes subject to implementation of the appropriate technical and organisational measures required by the Regulation in order to safeguard the rights and freedoms of the data subject;

- f) processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.

3. Lawful, Fair, and Transparent Data Processing

The Regulation seeks to ensure that personal data is processed lawfully, fairly, and transparently, without adversely affecting the rights of the data subject. The Regulation states that processing of personal data shall be lawful if at least one of the following applies:

- a) the data subject has given consent to the processing of his or her personal data for one or more specific purposes;
- b) processing is necessary for the performance of a contract to which the data subject is a party or in order to take steps at the request of the data subject prior to entering into a contract;
- c) processing is necessary for compliance with a legal obligation to which the controller is subject;
- d) processing is necessary to protect the vital interests of the data subject or of another natural person;
- e) processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller;

4. Processed for Specified, Explicit and Legitimate Purposes

4.1 The organisation collects and processes the personal data set out in Part 20 of this Policy.

4.2 The organisation only processes personal data for the specific purposes set out in Part 20 of this Policy (or for other purposes expressly permitted by the Regulation). The purposes for which we process personal data will be informed to data subjects at the time that their personal data is collected, where it is collected directly from them.

5. Adequate, Relevant and Limited Data Processing

The organisation will only collect and process personal data for and to the extent necessary for the specific purpose(s) informed to data subjects as under Part 4, above.

6. Accuracy of Data and Keeping Data Up To Date

The Organisation aims to ensure that all personal data collected and processed is kept accurate and up-to-date. Where any inaccurate or out-of-date data is found, all reasonable steps will be taken without delay to amend or erase that data, as appropriate.

7. Timely Processing

The Organisation shall not keep personal data for any longer than is necessary in light of the purposes for which that data was originally collected and processed. When the data is no longer required, all reasonable steps will be taken to erase it without delay.

8. **Secure Processing**

The Organisation shall ensure that all personal data collected and processed is kept secure and protected against unauthorised or unlawful processing and against accidental loss, destruction or damage. Further details of the data protection and organisational measures which shall be taken are provided in Parts 22 and 23 of this Policy.

9. **Accountability**

9.1 The Organisation will not appoint a data protection officer, as defined in the Regulation.

9.2 Organisation Manager shall keep written internal records of all personal data collection, holding, and processing, which shall incorporate the following information:

- a) The purposes for which the Organisation processes personal data;
- b) Details of the categories of personal data collected, held, and processed by the Organisation; and the categories of data subject to which that personal data relates;
- c) Details (and categories) of any third parties that will receive personal data from the Organisation;
- d) Details of any transfers of personal data to non-EEA countries including all mechanisms and security safeguards;
- e) Details of how long personal data will be retained by the Organisation; and
- f) Detailed descriptions of all technical and organisational measures taken by the Organisation to ensure the security of personal data.

10. **Privacy Impact Assessments**

The Organisation shall carry out Privacy Impact Assessments when and as required under the Regulation. Privacy Impact Assessments shall be overseen by the Organisation Manager and shall address the following areas of importance:

10.1 The purpose(s) for which personal data is being processed and the processing operations to be carried out on that data;

10.2 Details of the legitimate interests being pursued by the Organisation;

10.3 An assessment of the necessity and proportionality of the data processing with respect to the purpose(s) for which it is being processed;

10.4 An assessment of the risks posed to individual data subjects; and

10.5 Details of the measures in place to minimise and handle risks including safeguards, data security, and other measures and mechanisms to ensure the protection of personal data, sufficient to demonstrate compliance with the Regulation.

11. The Rights of Data Subjects

The Regulation sets out the following rights applicable to data subjects:

- a) The right to be informed;
- b) The right of access;
- c) The right to rectification;
- d) The right to erasure (also known as the 'right to be forgotten');
- e) The right to restrict processing;
- f) The right to data portability;
- g) The right to object;
- h) Rights with respect to automated decision-making and profiling.

12. Keeping Data Subjects Informed

12.1 The Organisation shall ensure that the following information is provided to every data subject when personal data is collected:

- a) Details of the Organisation including, but not limited to, the identity of any appointed Data Protection Officer;
- b) The purpose(s) for which the personal data is being collected and will be processed (as detailed in Part 21 of this Policy) and the legal basis justifying that collection and processing;
- c) Where applicable, the legitimate interests upon which the Organisation is justifying its collection and processing of the personal data;
- d) Where the personal data is not obtained directly from the data subject, the categories of personal data collected and processed;
- e) Where the personal data is to be transferred to one or more third parties, details of those parties;
- f) Where the personal data is to be transferred to a third party that is located outside of the European Economic Area (the "EEA"), details of that transfer, including but not limited to the safeguards in place (see Part 24 of this Policy for further details concerning such third country data transfers);
- g) Details of the length of time the personal data will be held by the Organisation, normally:-
 - data in customers will be kept for up to 2 years after the date of contracting with the Organisation and will then be deleted, unless the visitor or guest has consented that the data be retained by the Organisation for future communications.
- h) Details of the data subject's rights under the Regulation;
- i) Details of the data subject's right to withdraw their consent to the Organisation's processing of their personal data at any time;
- j) Details of the data subject's right to complain to the Information Commissioner's Office (the 'supervisory authority' under the Regulation);
- k) Where applicable, details of any legal or contractual requirement or obligation necessitating the collection and processing of the personal data and details of

any consequences of failing to provide it;

13. **Data Subject Access**

13.1 A data subject may make a subject access request (“SAR”) at any time to find out more about the personal data which the Organisation holds about them. The Organisation is normally required to respond to SARs within one month of receipt (this can be extended by up to two months in the case of complex and/or numerous requests, and in such cases the data subject shall be informed of the need for the extension).

13.2 All subject access requests received must be forwarded to the Organisation Manager, and data subjects will be advised of the contact details to enable such contact.

13.2 The Organisation does not charge a fee for the handling of normal SARs. The Organisation reserves the right to charge reasonable fees for additional copies of information that has already been supplied to a data subject, and for requests that are manifestly unfounded or excessive, particularly where such requests are repetitive.

14. **Rectification of Personal Data**

If a data subject informs the Organisation that personal data held by the Organisation is inaccurate or incomplete, requesting that it be rectified, the personal data in question shall be rectified, and the data subject informed of that rectification, within one month of receipt of the data subject’s notice (this can be extended by up to two months in the case of complex requests, and in such cases the data subject shall be informed of the need for the extension).

15. **Erasure of Personal Data**

15.1 Data subjects may request that the Organisation erases the personal data it holds about them in the following circumstances:

- a) It is no longer necessary for the Organisation to hold that personal data with respect to the purpose for which it was originally collected or processed. The data subject wishes to withdraw their consent to the Organisation holding and processing their personal data;
- b) The data subject objects to the Organisation holding and processing their personal data (and there is no overriding legitimate interest to allow the Organisation to continue doing so) (see Part 18 of this Policy for further details concerning data subjects’ rights to object);
- c) The personal data has been processed unlawfully;
- d) The personal data needs to be erased in order for the Organisation to comply with a particular legal obligation;

15.2 Unless the Organisation has reasonable grounds to refuse to erase personal data, all requests for erasure shall be complied with, and the data subject informed of the erasure, within one month of receipt of the data subject’s request (this can be extended by up to two months in the case of complex requests, and in such cases the data subject shall be informed of the need for the extension).

15.3 In the event that any personal data that is to be erased in response to a data subject request has been disclosed to third parties, those parties shall be informed of the erasure (unless it is impossible or would require disproportionate effort to do so).

16. **Restriction of Personal Data Processing**

16.1 Data subjects may request that the Organisation ceases processing the personal data it holds about them. If a data subject makes such a request, the Organisation shall retain only the amount of personal data pertaining to that data subject that is necessary to ensure that no further processing of their personal data takes place.

16.2 In the event that any affected personal data has been disclosed to third parties, those parties shall be informed of the applicable restrictions on processing it (unless it is impossible or would require disproportionate effort to do so).

17. **Data Portability**

The Organisation does not process personal data using automated means.

18. **Objections to Personal Data Processing**

18.1 Data subjects have the right to object to the Organisation processing their personal data based on legitimate interests, including direct marketing.

18.2 Where a data subject objects to the Organisation processing their personal data based on its legitimate interests, the Organisation shall cease such processing forthwith, unless it can be demonstrated that the Organisation's legitimate grounds for such processing override the data subject's interests, rights and freedoms; or the processing is necessary for the conduct of legal claims.

18.2 Where a data subject objects to the Organisation processing their personal data for direct marketing purposes, the Organisation shall cease such processing forthwith.

19. **Additional Client Services**

When the Organisation support clients in their applications for vacancies within the industry, the organisation :

- Gather responses from a client (applicant) only when permission from them has been obtained,
- Share a summary of these responses with the appointing organisation(club), as a small part of an overall assessment carried out by the organisation and the appointing client (club),
- Provide meaningful feedback to the client (applicant)
- Retain these responses in order to alert the client (applicant) to other roles of a very similar nature to that for which they applied.

20. **Personal Data**

The following personal data may be collected, held, and processed by the Company:

Clients - to participate in the activities of the Organisation

- a) Full name, gender;
- b) Contact details including contact address, telephone number, mobile number and email address;
- c) If submitted, the members photograph to be added onto the client file;

21. **Data Protection Measures**

The Organisation shall ensure that all its employees, agents, contractors, or other parties working on its behalf comply with the following when working with personal data:

- a) All emails containing personal data must be password protected.
- b) Where any personal data is to be erased or otherwise disposed of for any reason (including where copies have been made and are no longer needed), it should be securely deleted and disposed of. Hardcopies should be shredded, and electronic copies should be deleted securely.
- c) Personal data may be transmitted over secure networks only; transmission over unsecured networks is not permitted in any circumstances;
- d) Where Personal data is to be transferred in hardcopy form it should be passed directly to the recipient.
- e) No personal data may be shared informally.
- f) All hardcopies of personal data, along with any electronic copies stored on physical, removable media should be stored securely in a locked box, drawer, cabinet or similar;
- g) No personal data may be transferred to any employees, agents, contractors, or other parties, whether such parties are working on behalf of the Organisation or not, without the authorisation of the Organisation Manager;
- h) Personal data must be handled with care at all times and should not be left unattended or on view to unauthorised employees, agents, sub-contractors or other parties at any time;
- i) If personal data is being viewed on a computer screen and the computer in question is to be left unattended for any period of time, the user must lock the computer and screen before leaving it;
- j) No personal data should be stored on any mobile device (including, but not limited to, laptops, tablets and smartphones), whether such device belongs to the Organisation.
- k) All personal data stored electronically should be backed up with backups stored offsite. All backups should be encrypted.
- l) All electronic copies of personal data should be stored securely using passwords and data encryption (where available for banking and financial transmissions);

- m) All passwords used to protect personal data should be changed regularly and should not use words or phrases that can be easily guessed or otherwise compromised. Under no circumstances should any passwords be written down or shared between any employees, agents, contractors, or other parties working on behalf of the Company, irrespective of seniority or department. If a password is forgotten, it must be reset using the applicable method
- n) Personal data held by the Organisation will only be used to provide data subjects with information regarding Organisation services, including events and services.

22. **Organisational Measures**

The Organisation shall ensure that the following measures are taken with respect to the collection, holding, and processing of personal data:

- a) Office employees, agents, contractors, or other parties working on behalf of the Organisation shall be made fully aware of both their individual responsibilities and the Organisation's responsibilities under the Regulation and under this Policy, and shall be provided with a copy of this Policy;
- b) Only employees, agents, sub-contractors, or other parties working on behalf of the Organisation that need access to, and use of, personal data in order to carry out their assigned duties correctly shall have access to personal data held by the Organisation;
- c) Those employees, agents, contractors, or other parties working on behalf of the Organisation handling personal data will be appropriately trained to do so;
- d) All employees, agents, contractors, or other parties working on behalf of the Organisation handling personal data will be appropriately supervised;
- e) Methods of collecting, holding and processing personal data shall be regularly evaluated and reviewed;
- f) The performance of those employees, agents, contractors, or other parties working on behalf of the Organisation handling personal data shall be regularly evaluated and reviewed;
- g) All employees, agents, contractors, or other parties working on behalf of the Organisation handling personal data will be bound to do so in accordance with the principles of the Regulation and this Policy by contract;
- h) All agents, contractors, or other parties working on behalf of the Organisation handling personal data must ensure that any and all of their employees who are involved in the processing of personal data are held to the same conditions as those relevant employees of the Organisation arising out of this Policy and the Regulation;
- i) Where any agent, contractor or other party working on behalf of the Organisation handling personal data fails in their obligations under this Policy that party shall indemnify and hold harmless the Organisation against any costs, liability, damages, loss, claims or proceedings which may arise out of that failure.

23. **Transferring Personal Data to a Country Outside the EEA**

(For the purposes of these clauses, EEA means European Economic Area plus UK in the event that the UK leaves the EU.)

24.1 The Organisation may from time to time transfer ('transfer' includes making available remotely, or storage) personal data to countries outside of the EEA.

24.2 The transfer of personal data to a country outside of the EEA shall take place only if one or more of the following applies:

- a) The transfer is to a country, territory, or one or more specific sectors in that country (or an international organisation), that the European Commission has determined ensures an adequate level of protection for personal data;
- b) The transfer is to a country (or international organisation) which provides appropriate safeguards in the form of a legally binding agreement between public authorities or bodies; binding corporate rules; standard data protection clauses adopted by the European Commission; compliance with an approved code of conduct approved by a supervisory authority (e.g. the Information Commissioner's Office); certification under an approved certification mechanism (as provided for in the Regulation); contractual clauses agreed and authorised by the competent supervisory authority; or provisions inserted into administrative arrangements between public authorities or bodies authorised by the competent supervisory authority;
- c) The transfer is made with the informed consent of the relevant data subject(s);
- d) The transfer is necessary for the performance of a contract between the data subject and the Organisation (or for pre-contractual steps taken at the request of the data subject);
- e) The transfer is necessary for important public interest reasons;
- f) The transfer is necessary for the conduct of legal claims;
- g) The transfer is necessary to protect the vital interests of the data subject or other individuals where the data subject is physically or legally unable to give their consent; or
- h) The transfer is made from a register that, under UK or EU law, is intended to provide information to the public and which is open for access by the public in general or otherwise to those who are able to show a legitimate interest in accessing the register.

24. Data Breach Notification

25.1 All personal data breaches must be reported immediately to the Organisation Manager.

25.2 If a personal data breach occurs and that breach is likely to result in a risk to the rights and freedoms of data subjects (e.g. financial loss, breach of confidentiality, discrimination, reputational damage, or other significant social or economic damage), the Organisation Manager must ensure that the Information Commissioner's Office is informed of the breach without delay, and in any event, within 72 hours after having become aware of it.

25.3 In the event that a personal data breach is likely to result in a high risk (that is, a higher risk than that described under Part 25.2) to the rights and freedoms of data subjects, the data protection officer must ensure that all affected data subjects are informed of the breach directly and without undue delay.

25.4 Data breach notifications shall include the following information:

- a) The categories and approximate number of data subjects concerned;
- b) The categories and approximate number of personal data records concerned;
- c) The name and contact details of the Organisation Manager and/or Organisation Chairman (or other contact point where more information can be obtained);
- d) The likely consequences of the breach;
- e) Details of the measures taken, or proposed to be taken, by the Organisation to address the breach including, where appropriate, measures to mitigate its possible adverse effects.

25. Implementation of Policy

This Policy shall be deemed effective as of 2nd May 2018. No part of this Policy shall have retroactive effect and shall thus apply only to matters occurring on or after this date.

This Policy has been approved and authorised by:

Name: Mr K Fish
Position: Director, CCL Ltd
Date: May 2, 2018
Due for Review : Annually, May 1.

Appendix A - The Legitimate Interests Assessment

Data for Organisation clients is held for the Legitimate Interests of servicing clients needs.

1. The Purpose Test

Why do you want to process the data – what are you trying to achieve?	Efficient management of the Organisation, to allow clients to participate in all Organisation activities.
Who benefits from the processing? In what way?	The clients benefit directly by having access to Organisation services.
Are there any wider public benefits to the processing?	No.
How important are those benefits?	Important to provide support services to clients.
What would the impact be if you couldn't go ahead?	Clients would not be aware of the business support available to them.
Would your use of the data be unethical or unlawful in any way?	No. Our practices are widely adopted across organisations in the golf club sector in the UK.

2. The Necessity Test

Does this processing actually help to further that interest?	Yes. Clients businesses thrive.
Is it a reasonable way to go about it?	Yes, and common practices & systems applied across the golfing sporting organisations.
Is there another less intrusive way to achieve the same result?	Not in our view.

3. The Balancing Test

What is the nature of your relationship with the individual?	The Organisation provides a contracted service the clients.
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<p>Is any of the data particularly sensitive or private?</p>	<p>Clients will occasionally complete a professional development questionnaire with the intention of securing a new job with another of my clients.</p>
<p>Would people expect you to use their data in this way? Are you happy to explain it to them?</p>	<p>Yes. All clients must confirm that they consent to this policy before the collection of responses, and a full copy of this policy is made available for clients to access via the Organisation website.</p>
<p>Are some people likely to object or find it intrusive? What is the possible impact on the individual? How big an impact might it have on them?</p>	<p>No objections are expected, as the client will benefit from the exercise.</p>
<p>Are you processing children's data?</p>	<p>No</p>
<p>Are any of the individuals vulnerable in any other way? Can you adopt any safeguards to minimise the impact?</p>	<p>No.</p>
<p>Can you offer an opt-out?</p>	<p>No. This would be impractical, resulting in multiple systems and alternative processes.</p>