

For the purposes of the General Data Protection Regulation ("GDPR") and UK data protection laws, the controller is E G W Leisure LTD (the "Venue") of eGolf Swansea, Unit 1 Ground Floor, 22-23 High Street, Swansea, SA1 1LG

## **About this document**

This privacy policy sets out the way we process your personal data and we've created this privacy policy to make sure you are aware of how we use your data as a member/user of eGolf Swansea.

## **How we collect your information**

We may collect your personal data in a few limited ways, namely:

- Directly from you, when you fill in an applications, sign up process, when you make enquiries on our website or when you interact with us during your time as a user in various other ways (for example, where you enter a competition or attended an Centre open day);
- From someone else who has applied for services on your behalf (for example a family member who has provided us with your contact details for that purpose);

## **The types of information we collect**

We may collect the following types of personal data about you:

- Contact and communications information, including your contact details (including email address(es), telephone numbers and postal address(es) and records of communications and interactions we have had with you);
- Financial information, including Direct Debit details;
- Certain other information which you volunteer when making use of your user benefits (for example, when making a bay booking or making use of the facilities).

We may also collect data about your health or medical conditions, where you have volunteered this, for example so that we can cater for you when running such an event i.e. most golf holes played in a day for charity

## **How we use personal data**

Personal data provided to us will be used for the purposes set out at the time of collection and, where relevant, in accordance with any preferences you express.

More generally, we will use your personal data for the following purposes:

- Administration of golfing activities, including:
  - informing you about bay times / facilities opening hours;
  - taking payment of any fees;
  - Monthly newsletters
- Fulfilment of orders for goods and services, including any bookings;

Where this is necessary for the performance of a contract (including any written terms and conditions relating to your membership) with you;

- Research and statistical analysis about who is playing golf at our facility;
- Communication about our activities and what we think may be of interest to you;
- Storing your details on the software platform we use for our online member management database / bay booking system.

where this is necessary for our legitimate interests (for example in increasing use of our facilities and participation in the game generally);

- Promoting our goods and services of third parties (for example, equipment suppliers, operators of coaching courses, and organisers of golf events) where we think this will be of interest to you;

where this is necessary for our legitimate interests (or the legitimate interests of a third party), and/or where we have your consent, as applicable.

### **Your marketing preferences**

We will always respect your wishes in respect of what type of communications you want to receive from us and how you want to receive them. There are some communications, however, that we need to send you regardless of your marketing preferences in order for us to fulfil our contractual obligations to you as a member. Examples of these essential service communications are:

- Records of transactions, such as payment receipts or Direct Debit confirmations (as applicable).
- Membership related mailings such as your membership renewal reminder, notices of formal meetings and information about venue closures and holiday opening hours.

You are in control of how we communicate with you. You can update your choices and/or your contact details by contacting us at:

Telephone: 01792 TBC

Email: [info@egolfswansea.co.uk](mailto:info@egolfswansea.co.uk)

Post: eGolf Swansea, Unit 1 Ground Floor, 22-23 High Street, Swansea, SA1 1LG

### **Sharing your information with others**

We do not sell or share your personal data for other organisations to use other than as set out below.

Personal data collected and processed by us may be shared with the following third parties, where necessary:

- Our employees and volunteers, for the purposes of administering your membership and giving you access to the membership benefits to which you are entitled.
- Our contractors and suppliers, including coaches and any provider of membership management services.

### **How long your information is kept**

We keep your personal data only for as long as necessary for each purpose we use it. For most membership data, this means we retain it for so long as you have a valid membership and for a period of six years after your last interaction with us (for accounting, tax reporting and record-keeping purposes).

## Your rights

Under certain circumstances, by law you have the right to:

- Request access to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have exercised your right to object to processing (see below).
- Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal data for direct marketing purposes.
- Request the restriction of processing of your personal data. This enables you to ask us to suspend the processing of personal data about you, for example if you want us to establish its accuracy or the reason for processing it. You can also withdraw your consent, where this is the basis for our processing your data (without affecting the lawfulness of our previous processing based on consent).
- Request the transfer of your personal data to another party.

Please note that the above rights are not absolute, and we may be entitled to refuse requests where exceptions apply.

## Contact and complaints

If you have any queries about this privacy policy or how we process your personal data, or if you wish to exercise any of your legal rights, you may contact us:

- by email: [Owain@egolfswansea.co.uk](mailto:Owain@egolfswansea.co.uk)
- by telephone: 01792 TBC
- or by post: eGolf Swansea, Unit 1 Ground Floor, 22-23 High Street, Swansea, SA1 1LG

If you are not satisfied with how we are processing your personal data, you can make a complaint to the Information Commissioner. You can find out more about your rights under applicable data protection laws from the Information Commissioner's Office website: [www.ico.org.uk](http://www.ico.org.uk).