

FLIXTON GOLF CLUB



## **Flixton Golf Club**

Dear Member

### **General Data Protection Regulations (GDPR)**

On 25<sup>th</sup> May 2018 the above regulations came into force. These regulations superseded the Data Protection Act and covered all organisations that hold and process personal data whether held electronically or in paper form. Flixton Golf Club along with many other clubs and societies is not exempt. Below are some Q&A's from the Information Commissioners website.

#### **Who does the GDPR apply to?**

- The GDPR applies to 'controllers and processors
- A controller determines the purpose and means of processing personal data
- A processor is responsible for processing personal data on behalf of the Controller
- If you are a processor, the GDPR places specific legal obligations on you, for example, you are required to maintain records of a personal nature and processing activities. You have a legal liability if you are responsible for a breach.
- However, if you are a controller, you are not relieved of your obligations on you to ensure that your contracts with processors comply with GDPR.
- The GDPR does not apply to certain activities including processing covered by the Law Enforcement Directive, processing for national security purposes and processing carried out by individuals purely for personal/household purposes

For Flixton Golf Club the Hon. Secretary is the Controller and the Hon Treasurer and Administrator are the processors. Flixton Golf Club does not use a third party to process data.

#### **What information does the GDPR apply to?**

The GDPR applies to 'personal data' meaning any information relating to an identifiable person be identified who can directly or indirectly identified by reference to an identifier.

This definition provides for a wide range of personal identifiers to constitute personal data, including name, identification number, location data or on line identifier,

reflecting changes in technology and the way Flixton Golf Club collects information about Members

The GDPR applies to both automated personal data and to manual filing systems where personal data is accessible according to specific criteria. This could include chronologically ordered sets of manual records containing personal data.

Article 5 of the GDPR requires that personal data shall be:

- Processed lawfully, fairly and in a transparent manner in relation to individuals
- Collected for specific, 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 incompatible with the initial process.
- Adequate, relevant, and limited to what is necessary in relation to the purposes for which they are processed.
- Accurate and, where necessary kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased, or rectified without delay
- Kept in a form which permits identification of data subjects for no longer than is necessary for which the personal data are processed, personal data may be stored for longer periods insofar that personal data will be processed for archiving purposes in the public interest, scientific or historical purposes or statistical purposes subject to implementation of appropriate technical and organisational measures required by the GDPR to safeguard the rights and freedoms of individuals; and
- 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 methods

Article 5(2) requires that

The controller shall be responsible for, and be able to demonstrate, compliance with the principles.

To comply with the regulations Flixton Golf Club has prepared a Privacy Notice which the regulations require that this be available and transparent to those whose data is being held or processed. The Privacy Notice sets out the Clubs lawful basis for processing, what data is being held, what it is used for, who it is shared with, how long it is held and what Members rights are. The Privacy Notice is based on a template provided by Athletics England for its member clubs. The GDPR also requires some organisations to register with the Information Commissioners Office. As a non-for-profit organisation the Club is exempt from registration

If you wish to know more about GDPR please look at the information commissioners web site.

**Flixton Golf Club requests that all Members check and update any details which the Club currently holds including changes of address, email address, home and mobile telephone information.**