



Privacy Statement

Privacy Statement

What is the Purpose of this Privacy Statement?

This Dun Laoghaire Golf Club Privacy Statement refers to our commitment to treat the information of all Members and Member Applicants, employees and employment candidates, sub contractors, customers, visitors, suppliers and other interested parties with the utmost care and confidentiality.

With this policy, we ensure that we gather, store and handle data fairly, transparently and with respect towards individual rights in accordance with the applicable data protection legislation including the Irish Data Protection Acts and the EU General Data Protection Regulation.

Who does this Privacy Statement refer to?

This policy refers to all parties whose personal data is processed by us.

Who must follow this Privacy Statement?

Generally, this Statement applies to anyone we collaborate with or who acts on our behalf and may need occasional access to data.

Collection and Use of Your Personal Information

We may collect and process the following data through our website (and combine this with data provided offline through your interactions with us:

- Any information provided by or about you through our website including comment boxes, forms, links, website usage or any other means.
- If any person contacts us via phone, email, post, surveys, through our website or otherwise, we may keep a record of that correspondence.
- Where you purchase any products or services from us, we collect your data in relation to that product or service as set out in this policy and our contract with you for that product or service.
- information that you provide when you interact with us on social media or when you click on an ad that we put on our site or on someone else's website

As part of our services, we need to obtain and process data. This data includes any offline physical data or online data that makes a person identifiable such as your name, address, telephone number, e-mail address, payment card details, IP address, search terms, responses to research questions and surveys, CCTV, photographs, golf handicap, results of competition, responses to competition and promotion entries, CV's, content of applications for offers and other updates, the type of web browser you use, the times you access our site and how long you access it for, the details of the website that referred you to our site and other device location information, any content you share with us or provide to us and any other information you share with or provide to us. Except where you provide your personal information to us in accordance with the above, we will not collect these types of personal information without first asking you for it.

What is the legal basis for holding your data?

We collect your data based on the following legal basis:

- Consent - where you have agreed to us processing your information for a specific reason such as direct marketing or publicising contact information or parental consent for our junior members or explicit consent for us to process any special category of data about you

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- Contract - where you have entered into contract for membership, hiring of the facilities or providing outsourced services to Dun Laoghaire Golf Club and the processing is necessary to perform these services
- Compliance - the processing is necessary for compliance with a legal obligation we have such as keeping records for revenue or tax purposes, we may be required to process certain data to carry out our obligations under employment, social security or social protection law; the processing is necessary for the establishment, exercise or defence of legal claims, and to comply with the rules set out by the governing golf bodies.
- Legitimate Interest - the processing is necessary for the purposes of a legitimate interest pursued by us to provide our services and events to our members and other third parties, capturing the achievements of our members internally and representing the Club for posterity. To ensure that our services are well-managed or to ensure that complaints are managed effectively and to keep our members informed of essential communication. We will respect your privacy should you wish for your achievements not to be publicised.

How Dun Laoghaire Golf Club collects your data?

We collect this data in a transparent way and only with the full knowledge of interested parties. Once this information is available to us, the following rules apply. Our data will be:

- Accurate and kept up-to-date
- Collected fairly and for lawful purposes only
- Processed by us on the basis of either a valid contract, consent, legal compliance or legitimate interest
- Protected against any unauthorised or illegal processing by internal or external parties

Our data will not be:

- Communicated to any unauthorised internal or external parties
- Stored for more than a specified amount of time
- Transferred to organisations, states or countries outside the European Economic area without adequate safeguards being put in place as required under Data Protection law.

Where consent is relied upon as a basis for processing of any personal data, you will be presented with an option to agree or disagree with the collection, use or disclosure of personal data. Explicit consent will be required for the processing of any special category of personal data.

Information we provide before processing the data

Prior to processing any data we will always provide, via this Privacy Statement, the following information:

- Which of their data is collected
- How we process their data
- The purpose for processing their data
- Who has access to their information
- Provisions in cases of lost, corrupted or compromised data
- Information relating to the right to request that we modify, erase, reduce or correct data contained in our systems
- Information relating to data subjects rights in relation to their data.

How we protect your data

Our commitment to protect your data:

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- Restrict and monitor access to sensitive data
- Develop transparent data collection procedures
- Train employees in data protection and security measures
- Build secure networks to protect online data from cyberattacks
- Establish clear procedures for reporting privacy breaches or data misuse
- Include contract clauses or communicate statements on how we handle data
- Establish data protection practices (document shredding, secure locks, data encryption, frequent backups, access authorisation).

Disclosure of data

Your personal information may also be processed by other organisations on our behalf for the purposes outsourced services and compliance. We may disclose your information to subcontractors whom have signed a binding agreement with a data protection clause. Some of these parties may reside outside the European Economic Area (which currently comprises the Member states of the European Union plus Norway, Iceland and Liechtenstein). If we do this, your information will be treated to the same standards adopted in Ireland. We may also disclose your information for the prevention and detection of crime and to protect the interests of Dun Laoghaire Golf Club or others, or if required to do so by law or other binding request.

Dun Laoghaire Golf Club share member's details with external bodies such as the Governing Golf Bodies, Club's Insurers, Inter club competition organisers, other clubs where necessary, Club's legal representatives and Public Licencing authorities.

How long will be hold your personal data?

We will only retain personal data for as long as necessary for the purposes for which it was collected; as required by law or regulatory guidance to which we are subject or to defence any legal actions.

We will retain personal data about job applicant candidates for no more than one year

Application for an unsolicited job

If you are interested in applying for an unsolicited job within Dun Laoghaire Golf Club you may provide us with your CV. We will then match your qualifications and experience to the position you applied for, or any other current job opportunity. If your profile corresponds to our requirements, we will contact you.

The purpose of personal data processing

The personal data you provide us will be used for the purpose described below:

Solicited or unsolicited job applications:

Dun Laoghaire Golf Club collects and processes name and contact details and other personal data which you have provided in your CV and job application.

Emails

Any emails sent between Dun Laoghaire Golf Club and the person sending unsolicited CV's solely for business communication purposes will not be personal data.

Deletion and rectification of your personal data



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Personal data processed because of unsolicited job applications, where the job applicant is not offered a job, will be deleted 1 week after the rejection of application has been sent to the job applicant, unless the job applicant accepts the storage for a longer period. In such case, the application will be stored for 6 months.

Sensitive personal data

Dun Laoghaire Golf Club endeavours not to collect “sensitive personal data” via CV’s. By “sensitive personal data” is meant personal data relating to race or ethnic origin, political opinions, religious or philosophical beliefs, membership of trade unions, or health or sex life. If you make unsolicited sensitive personal data available to us (for example, by including this on a C.V.), you are required to provide explicit consent for Dun Laoghaire Golf Club to process this data.

I.I Right to Erasure

When have I the right to all my personal data being deleted by Dun Laoghaire Golf Club?

You have the right to have your personal data deleted without undue delay if:

- The personal data is no longer necessary in relation to the purpose(s) for which it was collected/processed
- You are withdrawing consent and where there is no other legal ground for the processing
- You object to the processing and there are no overriding legitimate grounds for the processing
- The personal data has been unlawfully processed
- The personal data has to be erased so that we are in compliance with legal obligation
- The personal data has been collected in relation to the offer of information society services with a child.

What happens if Dun Laoghaire Golf Club has made my personal data public?

If we have made your personal data public, we, taking account of available technology and the cost of implementation, will take reasonable steps, including technical measures, to inform those who are processing your personal data that you have requested the erasure.

What happens if Dun Laoghaire Golf Club has disclosed my personal to third parties?

Where we have disclosed your personal data in question to third parties, we will inform them of your request for erasure where possible. We will also confirm to you details of relevant third parties to whom the data has been disclosed where appropriate.

I.II Right to Data Portability

When can I receive my personal data in machine readable format from Dun Laoghaire Golf Club?

You will receive your personal data concerning you in a structured, commonly used and machine-readable format if:

- processing is based on consent
- processing is carried out by automated means.

Would Dun Laoghaire Golf Club transfer the personal data to another service provider if I requested this?

We can transfer this data to another company selected by you on your written instruction where it is technically feasible taking account of the available technology and the feasible cost of transfer proportionate to the service we provide to you.

Under what circumstances can Dun Laoghaire Golf Club refuse?

You will not be able to obtain, or have transferred in machine-readable format, your personal data if we are processing this data in the public interest or in the exercise of official authority vested in us.

Will Dun Laoghaire Golf Club provide me with my personal data if the file contains the personal data of others?

We will only provide you with your personal data, ensuring we protect the rights and freedoms of others. Where personal data of another person may be on the same files as yours, we will redact the full details of the other person.

Contact us at dpl@dlgc.ie or +353 (0)1 272 1866.

I.III Right for Automated Individual Decision Making including Profiling

What are my rights in respect of Automated Decision making?

Dun Laoghaire Golf Club does not have any automated decision-making processes. Where any such processes are introduced, we will provide you with the relevant information required under the “General Data Protection Regulation”.

I.IV Right to Object

Have I already been informed about my right to object?

We have informed you of your right to object prior to us collecting any of your personal data as stated in our privacy notice.

When can I object to Dun Laoghaire Golf Club processing my personal data?

You can object on grounds relating to your particular situation.

We will stop processing your personal data unless:

- we can demonstrate compelling legitimate grounds for the processing, which override your interests, rights and freedoms; or
- the processing is for the establishment, exercise or defence of legal claims.

What are my rights to object for direct marketing purposes?

Where your personal data is processed for direct marketing purposes, you have the right to object at any time to processing of personal data concerning you for such marketing, which includes profiling to the extent that it is related to such direct marketing.

Where you object to processing for direct marketing purposes, we will no longer process this data for such purposes.

What are my rights to object in the use of information society services?

In the context of the use of information society services, you may exercise your right to object by automated means using technical specifications.

Contact us at dpl@dlgc.ie or +353 (0)1 272 1866.

I.V Right to Restriction of Processing

When can I restrict processing?

You may have processing of your personal data restricted:

- While we are verifying the accuracy of your personal data which you have contested
- If you choose restricted processing over erasure where processing is unlawful
- If we no longer need the personal data for its original purpose but are required to hold the personal data for defence of legal claims
- Where you have objected to the processing (where it was necessary for the performance of a public interest task or purpose of legitimate interests), and we are considering whether our legitimate grounds override.

What if Dun Laoghaire Golf Club has provided my personal data to third parties?

Where we have disclosed your personal data in question to third parties, we will inform them about the restriction on the processing, unless it is impossible or involves disproportionate effort to do so.

How will I know if the restriction is lifted by Dun Laoghaire Golf Club and/or relevant third parties?

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We will inform on an individual basis when a restriction on processing has been lifted.
Contact us at dpl@dlgc.ie or +353 (0)1 272 1866.

I.VI Right of Rectification Policy

What can I do if Dun Laoghaire Golf Club is holding incorrect personal data about me?

Where you suspect that data we hold about you is inaccurate, we will on demand rectify any inaccuracies without undue delay and provide confirmation of same.

What happens if Dun Laoghaire Golf Club has disclosed my personal to third parties?

Where we have disclosed inaccurate personal data to third parties, we will inform them and request confirmation that rectification has occurred. We will also provide you with details of the third parties to whom your personal data has been disclosed.

Contact us at dpl@dlgc.ie or +353 (0)1 272 1866.

I.VII Right to withdraw Consent

Under what circumstances could I withdraw consent?

You can withdraw consent if we are processing your personal data based on your consent.

When can I withdraw consent?

You can withdraw consent at any time.

If I withdraw consent what happens to my current data?

Any processing based on your consent will cease upon the withdrawal of that consent. Your withdrawal will not affect any processing of personal data prior to your withdrawal of consent, or any processing which is not based on your consent.

Contact us at dpl@dlgc.ie or +353 (0)1 272 1866.

I.VIII Right to lodge a complaint

Can I lodge a complaint with the Data Protection Commission?

You can lodge a complaint with the Data Protection Commission in respect of any processing by or on behalf of Dun Laoghaire Golf Club of personal data relating to you.

How do I lodge a complaint?

Making a complaint is simple and free. All you need to do is write to the Data Protection Commission giving details about the matter. You should clearly identify the organisation or individual you are complaining about. You should also outline the steps you have taken to have your concerns dealt with by the organisation, and what sort of response you received from them. Please also provide copies of any letters between you and the organisation, as well as supporting evidence/material.

What happens after I make the complaint?

The Data Protection Commission will then take the matter up with us for you.

I.IX Right of Access Policy

When do I have the right to access my personal data from Dun Laoghaire Golf Club?

Where we process any personal data relating to you, you have the right to obtain confirmation of same from us, and to have access to your data.

What information will Dun Laoghaire Golf Club provide to me?

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If we are processing your personal data you are entitled to access a copy of all such personal data processed by us. We will also provide the following information including your full rights under Data Protection:

- why we are processing your personal data
- the types of personal data concerned
- the third parties or categories of third parties to whom the personal data have been or will be disclosed. We will inform you if any of the third parties are outside the European Economic Area (EEA) or international organisations
- how your personal data is safeguarded where we provide your personal data outside the European Economic Area or to an international organisation
- the length of time we will hold your data or if not possible, the criteria used to determine that period
- your rights to:
 - request any changes to inaccurate personal data held by us
 - have your personal data deleted on all our systems
 - restriction of processing of personal data concerning you
 - to object to such processing
 - data portability
- your right to lodge a complaint with the Data Protection Commission info@dataprotection.ie
- where we have collected your personal data from a third party, we will provide you with the information as to our source of your personal data
- any automated decision-making, including profiling which includes your personal data. We will provide you with meaningful information about the logic involved, as well as the significance and the envisaged consequences of such processing for you.

How long will it take to receive my personal data from Dun Laoghaire Golf Club?

We will provide you with a copy of the personal data we are currently processing within 30 days of request. In rare situations if we are unable to provide you with the data within 30 days we will notify you within 10 days of your request explaining the reason for the delay and will commit to delivery within 60 days.

How much will it cost me to receive my personal data?

We will not charge for providing your personal data unless we believe the request is excessive and the cost of providing your data is disproportionate to your services provided.

Can I request additional copies of my personal data?

If you require additional copies we will charge €20 to cover our administrative costs.

Can I receive my personal data electronically?

You can request your personal data by electronic means and we will provide your personal data in a commonly used electronic form if technically feasible.

What will Dun Laoghaire Golf Club do if another person's personal data is shared with my personal data?

We will only provide you with your personal data, ensuring we protect the rights and freedoms of others. Where personal data of another person may be on the same files as yours, we will redact the full details of the other person.

Contact Us at dpl@dlgc.ie or +353 (0)1 272 1866.