



PORT ST MARY GOLF CLUB LIMITED - PRIVACY POLICY

Background

This Privacy Policy is issued by Port St Mary Golf Club Limited (referred to as the “**Golf Club**”, “**we**”, “**us**” and “**our**” in this Privacy Policy), which operates in the Isle of Man.

Your information will be held by the Golf Club. This privacy notice sets out how the Golf Club will look after your personal information. This includes what you tell us about yourself, what we learn by having you as a member or visitor to the Golf Club or if you provide services to us, and the choices you give us about what marketing you want us to send you. This notice also tells you about your privacy rights and how the law protects you.

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1. ABOUT THIS POLICY

1.1 Scope of this policy

This Privacy Policy relates to our use of any personal information we collect from you via the following services:

- any website of the Golf Club that links to this Policy (“**Websites**”); or
- social media or Golf Club content on other websites; or
- whilst providing agreed services to you or receiving services from you.

It also relates to our use of any personal information we collect through other means, such as

- Email
- In person
- Other third party sources.

We’ve approached our Privacy Policy with brevity and clarity in mind. If you would like any additional information or explanation or would like us to answer any questions you may have please contact us using the details provided (see the “HOW TO CONTACT US” section below).

1.2 Policy updates

We will keep this Privacy Policy under regular review to make sure we’re being transparent about how we use your personal information. Any changes to our Privacy Policy will be reflected at <https://www.portstmarygolfclub.im>

2. ABOUT PORT ST MARY GOLF CLUB

2.1 Who are we?

Whilst the golf club has actually been in existence since 1903, with the current course being opened in 1936, Port St Mary Golf Club Limited was incorporated in June 2009. Port St Mary Golf links is a 9 hole course situated off Kallow Point Road in the picturesque fishing village of Port St Mary, Isle Of Man. The Golf Club has been privately run since 2009 with the course being leased from Port St Mary Commissioners. You’ll find our registered address below.

2.2 Who’s the Data Controller?

For the purposes of data protection laws, we are the “**data controller**” of all personal information that we collect, use and/or otherwise process about you under this Privacy Policy.

3. WHAT INFORMATION DO WE GATHER AND HOW DO WE COLLECT IT?

3.1 What types of information do we collect about you?

The type of information we collect about you depends on the nature of your interactions with us. Depending on the circumstances, we may receive or collect personal information about you, when you contact the Golf Club for example by doing any of the following:

Data you give to us:

- When you register as a member of the Golf Club
- When you book a tee time or hire a golf buggy
- When you enter an event.
- When you attend an event at the Golf Club.
- When you talk to us on the phone or in our offices
- When you use our website
- In emails and letters that you send to us.
- In any membership surveys.
- When we engage you to provide services to the Golf Club.

Data we collect when you use our services:

- Payment and transaction data.
- We may from time to time collect profile and usage data. This includes the profile you create to identify yourself when you connect to our internet. Whilst we do not currently use Cookies if we did would also include other data about how you use those services. We would gather this data from devices you use to connect to those services, such as computers and mobile phones, using cookies and other internet tracking software.

Data from third parties we may work with:

- Event sponsors.
- Insurers.
- Banks.
- Market researchers.

Data we collect during the course of providing services

- If you enter a draw or competition at the Golf Club
- If you book a tee time.

3.2 Personal information about others

We may collect information from you about others, such as members of your household or family (e.g. when you book a tee time), or work colleagues in the case of service providers. If you give us information about another person it is your responsibility to ensure and confirm that:

- you have either told the individual who we are and how we use personal information, as set out in this Privacy Policy; and have permission from the individual to provide that personal information (including any sensitive personal data) to us and for us to process it, as set out in this Privacy Policy; or
- you are otherwise satisfied that you are not in breach of data protection legislation by providing the information to us.

4. WHEN DO WE COLLECT YOUR SENSITIVE INFORMATION?

In certain circumstances, we may collect information that is deemed sensitive. This may include information about your health (for example if you have an accident on the golf course).

We seek to limit any sensitive personal data that we collect and, unless we have other specific lawful reasons to use this information (such as in an emergency situation), we will ask for your consent to collect it.

5. HOW THE LAW PROTECTS YOU

Your privacy is protected by law. This section provides an overview of how that protection works.

Data protection law states that we are only allowed to use personal information if we have a proper reason to do so. This includes sharing it outside the Golf Club. The law states that we must have one or more of the following reasons:

- when you consent to it; or
- to fulfil a contract we have with you, or
- when it is our legal duty, or
- when it is in our legitimate interest.

A legitimate interest is when we have a business or commercial reason to use your information. But even then, it must not unfairly go against what is best or right for you. If we rely on our legitimate interest, we will tell you what that is. The section below (“How We Use Your Personal Data) contains a list of the ways in which we may use your personal information, and the reasons we rely on to do so. This is also where we tell you what our legitimate interests are.

6. HOW WE USE YOUR INFORMATION

We will only use your personal data fairly and where we have a lawful reason to do so. We are allowed to use your personal data if we have your consent or another legally permitted reason applies. These include to fulfil a contract we have with you, when we have a legal duty that we have to comply with, or when it is in our legitimate business interest to use your personal data. We can only rely on our legitimate business interest if it is fair and reasonable to do so. We may use information to:

Uses of personal data	The Golf Club’s lawful basis for using your personal data
<ul style="list-style-type: none"> To manage and administer our relationships, including to communicate with our members and any service providers or suppliers that we use, to administer membership payments, any other billing and payments, to collect and recover money that is owed to us and to keep records. 	<p>To provide membership services, the terms of contracts with any suppliers or service providers, and to comply with legal and regulatory obligations including accounting, tax, data protection and health and safety.</p>
<ul style="list-style-type: none"> To help us identify, investigate, report and seek to prevent crime. To comply with laws and any regulations that apply to us 	<p>To comply with our legal and regulatory obligations.</p> <p>To safeguard the Golf Club, its members and its operations.</p>
<ul style="list-style-type: none"> To provide information services to members by email updates and newsletters. This may include surveys to obtain feedback from you. To identify events and competitions which may be of interest to you and provide you with information about those events and competitions. 	<p>Where you have consented and expressed a preference to receive marketing communications; or if we feel it is appropriate and relevant to our relationship with you.</p>
<ul style="list-style-type: none"> To run the Golf Club in an efficient and proper way (e.g. undertaking an audit, managing the Club’s operations, managing risk for us and our members and visitors, finances, planning, communications with service providers, members, any sponsors and corporate governance, responding to complaints and seeking to resolve them). 	<p>When needed for the efficient operation of the Golf Club.</p>
<ul style="list-style-type: none"> To maintain lists to ensure that you do not receive communications from us where you have objected to this or have unsubscribed. 	<p>To safeguard your rights and comply with our legal obligations.</p>
<ul style="list-style-type: none"> To optimise our website. We may from time to time collate information on how you interact with us and our services so that we can improve this if 	<p>Where we have consent from you or on the basis of our legitimate interests to operate and present an effective and convenient</p>

felt necessary.	website to our website users.
<ul style="list-style-type: none"> To exercise our rights contained in agreements or contracts, website terms of use and other terms and conditions of business. This may include complying with agreements with any service providers/suppliers we use or sponsors that we work with. 	Fulfilling contracts or to protect our legal interests.
<ul style="list-style-type: none"> To ensure security and protect our business interests. 	In certain circumstances, we may use your information to ensure the security of our services, offices and those working at the Club, including to protect against, investigate and deter fraud, unauthorised or illegal activities, systems testing, maintenance and development (on the basis of our legitimate interests to operate a safe and lawful operation or where we have a legal obligation to do so).
<ul style="list-style-type: none"> For other purposes that we have identified when we collect the information (such as processing a job application). 	Where we have your consent or on the basis of our legitimate interest to recruit new employees or contractors.

Groups of personal information

We collect and use lots of different types of personal data. Personal data is any information that relates to you and that identifies you either directly from that information or indirectly, by reference to other information that we have access to. The personal data that we collect, and how we collect it, depends upon how you interact with us. Categories of personal data that we collect include (this list is not exhaustive):

<i>Contact</i>	Such as your name, address, email address and telephone number.
<i>Socio-Demographic</i>	This includes details about your work or profession, nationality and education.
<i>Contractual</i>	Details about the services we provide to you, such as use of the golf course.
<i>Locational</i>	Data we get about where you are, such as the address where you connect a computer to the internet.
<i>Behavioural</i>	Details about how you use our services – such as visiting the golf course, entering events, etc.

<i>Communications</i>	What we learn about you from letters, emails, conversations between us, feedback and survey responses.
<i>Open data and public records</i>	Details about you that are in public records such as IOM Companies Registry, the IOM Electoral Register, and information about you that is openly available on the internet.
<i>Usage data</i>	Other data about how you use our services.
<i>Special types of data</i>	<p>The law and other regulations treat some types of personal information as special. We will only collect and use these types of data if the law allows us to do so, for example:</p> <ul style="list-style-type: none"> • Religious or philosophical beliefs • Genetic and bio-metric data • Health data including gender • Criminal convictions and offences.
<i>Consents</i>	Any permissions, consents, or preferences that you give us. This includes things like how you want us to contact you.
<i>Financial</i>	Billing and financial information such as billing address, bank account and other payment information.
<i>Personal images</i>	Photographs that may be taken of members and other visitors to the golf course during competitions and events.

7. SHARING YOUR INFORMATION OUTSIDE OF THE GOLF CLUB

7.1 If you use any of our services (such as booking a tee time or entering an event), your personal information may be shared with and processed by persons that are not employees, members or volunteers for the Golf Club but who work for or on behalf of others such as service providers and sponsors. Your information may also be disclosed when we believe in good faith that the disclosure is:

- required by law;
- to protect the safety of our employees, members and volunteers, the public or our property;
- required to comply with a judicial proceeding, court order or legal process; or
- for the prevention or detection of crime (including fraud).

We may also share your personal data when you have consented to us doing so.

We may also disclose your information to third party suppliers or service providers to conduct our operations, for example, to assist in managing and storing data.

We may share your information with governmental/regulatory bodies (directly or via shared databases) to prevent and detect fraud or criminal offences.

Where we do share your information with third parties, we will wherever possible require them to maintain appropriate security to protect your information from unauthorised access or processing.

7.2 If you choose not to give personal information

We may need to collect personal information by law, or under the terms of a contract we have with you.

If you choose not to give us this personal information, it may delay or prevent us from meeting our obligations.

Any data collection that is optional would be made clear at the point of collection.

7.3 Our service providers and suppliers

We are based in the Isle of Man and will not send your personal data outside the European Economic Area (“EEA”).

8. MARKETING

8.1 When you’ll hear from us

We may from time to time provide you with updates and offers for the Golf Club’s products and services via marketing tailored to you, whether through online services or by direct marketing (e.g. phone, e-mail, text, post) and use information we hold about you to help us identify, tailor and package things that may be of interest to you (such as golf competitions and other events). We will only do this if you have indicated that you are happy to receive marketing communications from us – that is, if you have either:

- used similar products and/or services provided by us, we have given you the opportunity to tell us whether you want to receiving marketing communications from us or not, and have not told us that you don’t want to hear from us; or
- signed up to receive marketing communications from us and have not later told us that you don’t want to hear from us.

We will not use sensitive personal details (such as information relating to your health record or any criminal issues) in order to provide you with marketing unless you have given your explicit consent to allow us to use this information for these purposes.

8.2 Opting out of or withdrawing your consent in relation to marketing

If you no longer want to hear from us, you can opt out or unsubscribe by:

- by Email to: psmiomgolf@gmail.com
- by contacting us on the details given in section 13 below headed “HOW TO CONTACT US”.

8.3 Third parties and marketing

At present, we do not rely on third parties to help us manage our marketing communications. We won’t share your information with any third parties for their marketing purposes unless you agree to our doing so.

9. OUR SITE AND COOKIES

9.1 What we collect when you interact with our sites and apps

As you may already know, most websites collect certain information automatically about the way in which you interact with them. This might include your IP address, geographical location, device information (such as your hardware model, mobile network information, unique device identifiers) browser type, referral source, length of visit to the site, number of page views, the

search queries you make, and similar information.

We do not currently collect this information. However, we may in the future arrange for this information to be collected by us or by a third party site analytics service provider and if we do so, it will be collected using cookies.

As we've described above, we may use this information to save your settings, such as the last product or service you searched for so you can find it easily the second time, help improve our functionality and services, run diagnostics, analyse trends, track visitor movements, gather broad demographic information and personalise our services.

9.2 What do we mean by "cookies"?

Cookies are small amounts of information in the form of text files that we may store on the device you use to access our site or our marketing communications. Cookies will allow us to monitor your use of our services and improve them. For example, a temporary cookie is also used to keep track of your "session". Without that temporary cookie you will not be able to purchase products or other services that may be offered via the Golf Club's site.

We may also use cookies for site analytics purposes and to monitor how members and other visitors to our site interact with and receive our marketing communications (for example if you open a marketing communication and/or click on any of our offers). If we use cookies, we will use this information to try to improve the relevance and tone of our future communications to ensure we're serving you as best as we can.

If you don't want cookies to be installed on your device, you can change the settings on your browser or device to reject cookies. For more information about how to reject cookies using your internet browser settings, please consult the "Help" section of your internet browser or visit <http://www.aboutcookies.org>. Please note that if you do set your Internet browser to reject cookies, you may not be able to access all of the functions of the site.

10. YOUR RIGHTS

10.1 Your data protection rights

Under data protection legislation you have various rights in respect of the personal information that we hold about you, including:

- you can require us, to update or correct any inaccurate personal data, or to complete any incomplete personal data, concerning you. If you do, we will take reasonable steps to check the accuracy of, and correct the information. Please let us know if any of your information changes so that we can keep it accurate and up to date;
- you can require us to stop processing your information for direct marketing purposes; if you withdraw your consent, we may not be able to provide certain products or services to you; and
- you have the right to object to our use of your personal data more generally.

You may also have the right, in certain circumstances to:

- be provided with a copy of any personal data that we hold about you, with certain related information. There are exceptions to this right; for example where information is legally privileged or if providing you with the information would reveal personal data about another person;
- to require us, without undue delay, to delete your personal data; and
- to "restrict" our use of your information, so that it can only continue subject to restrictions..

Please note that we reserve the right to retain certain information for our own record-keeping (for example, to ensure that you do not receive marketing communications that you have opted-out of receiving) and to defend ourselves against any legal claims.

10.3 How to exercise your rights

- You can exercise your rights by contacting us using the details in the “HOW TO CONTACT US” section below, or by ticking the applicable boxes on forms that we use to collect your information, or to tell us that you don’t want to participate in marketing.
- If you wish to remove your information from our marketing circulation lists, which includes receiving marketing emails, you can unsubscribe by scrolling to the bottom of the email and clicking the ‘unsubscribe’ link (which will be contained in any marketing communications we send to you).
- We will comply with your requests unless we have a lawful reason not to do so.
- We may need you to provide satisfactory proof of your identity. This is to ensure that your personal data is disclosed only to you.

11. HOW WE LOOK AFTER YOUR INFORMATION

11.1 We are committed to protecting the confidentiality and security of the information that you provide to us. We put in place appropriate technical, physical and organisational security measures to protect against any unauthorised access or damage to, or disclosure or loss of, your information. By way of example we:

- Ensure appropriate access controls so that access to your information is only granted to those of our people that need to use it in the course of their work.

11.2 Links to other sites and resources

- Our website may from time to time contain content and links to other sites that are operated by third parties. You should note that we do not control these third party sites or the cookies that such third parties operate and this Privacy Policy will not apply to them. You should ensure that you consult the Terms of Use and Privacy Policy of the relevant third party site to understand how that site collects and uses your information and to establish whether and for what purposes they use cookies.
- You should also be aware that communications over the internet, such as e-mails, are not secure unless they have been encrypted.

12. HOW LONG WE KEEP YOUR INFORMATION FOR

We do not keep your personal data for any longer than is necessary to fulfil the purpose for which we collected it, or to comply with any legal or reporting obligations or to assert or defend against legal claims. We will generally keep your data for no longer than six years for one of these reasons:

- To comply with our legal obligations.
- To respond to any questions or complaints.
- To show that we treated you fairly.
- To maintain records according to any rules that apply to us.

We may keep your data for longer than six years if we cannot delete it for legal or technical reasons. We may also keep it for research or statistical purposes. If we do, we will make sure that your privacy is protected and only use it for those purposes.

13. **HOW TO CONTACT US**

If you have any questions about this Privacy Policy or the ways in which we handle your personal information or if you want to make a subject access request, please contact us at:

The Privacy Officer
Port St Mary Golf Club Limited
Port St Mary Golf Pavilion
Kallow Point Road
Port St Mary IM9 5EJ
Isle of Man

Email: psmiomgolf@gmail.com

However, if you remain dissatisfied with our response, you have the right to take the matter up with the Isle of Man Information Commissioner (IC). The IC is the Isle of Man's independent authority set up to uphold information rights.

You can contact the Information Commissioner via the ICO website at <https://www.inforights.co.im>.

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