



BB&O GOLF LIMITED

PRESIDENT: M. R. PARTRIDGE

CEO: J A KENNEDY

County Union Office

Unit 5, Rycote Farm, Rycote Lane, Thame, Oxon, OX9 2NZ

Tel: 01844 279600

Web Site: www.bbogolf.com e-mail: secretary@bbogolf.com

DATA PROTECTION POLICY

This Document outlines the way in which BB&O Golf Ltd will handle personal data provided to us. Our Policy centres around six principles. We will ensure that all data is processed fairly, lawfully and transparently. We will only store and process data for specific and legitimate purposes. The personal data we collect will be adequate, relevant and limited to what is necessary for the purpose for which we collected it. We will endeavour to keep our data accurate and up to date and we will keep that data for no longer than is necessary. All data will be processed in a manner that ensures appropriate technical and organisational security.

THE DATA WE HOLD

COUNTY CARD HOLDERS

The process for applying for a BB&O County Card is handled on-line via Intelligent Golf. Members of participating clubs can download an app and once they've submitted their CDH number, the digital county card appears on their app. They have a sign-up option to receive communication from us on County Card offers etc, but can unsubscribe from this list at any time. BB&O do NOT hold this list, but details are held by Intelligent Golf.

COMPETITION PLAYERS

To effectively run elite events, we must ensure that players who are entering qualify via certain criteria. In setting up online entry fields it is important that we are able to specify minimum or maximum ages, handicaps, ensure players are members at affiliated clubs and be able to contact them to inform them of tee off times etc. In order to carry this out efficiently we will collect their names, CDH number, date of birth, gender, contact number, e mail address and mailing address. This then updates a Player Profile form which recognises players when they enter future events. We will only keep these profiles for 3 years and will not use this information other than to contact players regarding the specific events that they have registered for.

Parents of junior players who are intending to enter our events will be required to submit a Parental Consent Form in order for BB&O staff to deal with emergencies on the day of events. These Parental consent forms will be held securely and erased when the competition season has finished. For juniors playing in the Futures Tour we will also require a shirt size as BB&O shirts are provided but these records will be erased at the end of the tournament season.

We will keep a mailing list of players who have asked us to keep them updated specifically on upcoming tournaments, reports of results in tournaments and update them of any BB&O golfing news. We will also have a section on our website where a player can sign up for this information to be sent to them. Every time we use this database we will give those golfers the option to opt out of the communications that they have previously signed up for.

SQUAD MEMBERS

At the start of each competitive season, we will invite selected players to join our County Squads. Those players will provide their e mail addresses in order for Team Managers and BB&O staff to contact them in relation to County Team training sessions, team selections and tournament information. Parents of Junior players will also be required to submit a Parental Consent Form which enables team managers to deal with emergencies on the day. At the end of the playing season, we will erase the Parental Consent Forms and squad members for the following year will be required to submit a Parental consent form that relates to the new season. Managers and Coach's will be required to deal with squad data in line with our Protection Policy.

MEMBERS OF STAFF

Details of contracts, personnel information and personal details required for paying salaries will be kept in a password secured file that only the CEO has access to. Personal details of past members of staff will be erased unless it is felt that records need to be kept after they have left for legal reasons. The only financial records that will be kept will be in line with the required documents needed for Tax inspections.

GOLF CLUB MANAGERS AND CLUB OFFICIALS

An affiliated Golf Club has effectively entered into a contract with BB&O Golf Limited and as such we often need to contact Golf Club Managers and Officials to discuss related business that directly affects their club. This can range from news of regulation changes, news reports that include members of their club, notification of meetings and seminars, notification of support available and liaising with course assessments and affiliation payments. In order to carry out these tasks (which are expected of us) we will keep databases that contain just name, position within the club and email address. As soon as we are informed of a change of personnel, we will immediately erase the old contact details and change them to the details given to us.

For our Hillman knockout trophies, we will need a contact number from each team manager which will then be distributed between all competing teams. This will be erased at the end of the event and all recipients will be reminded that this information can only be used in connection with that particular event.

BOARD MEMBERS, TEAM MANAGERS AND COACHES

Board Members have joined the Board and are therefore represented by the CEO's office. Team Managers have volunteered to manage County teams and have asked the office to support them in their duties. As such, a database holding their contact details will be kept. As soon as a member of either the Board or one of the Team Managers steps down they will be asked to confirm whether or not they want to continue receiving notifications from us and if they don't their contact details will be erased. Coaches have entered into a contract with BB&O Golf and therefore we will keep contact details that allow us to liaise with them and pay them for their duties.

All volunteers or members of staff that work with young golfers will be asked to fill in a DBS return in order for BB&O Golf to check on their suitability to work with young golfers. We will keep these records to enable us to prove that we had followed procedure should we ever need to in the future.

IN ALL OF THE CASES ABOVE WE ARE COMMITTED TO KEEPING ONLY THE MINIMUM AMOUNT OF DATA REQUIRED TO CARRY OUT THE TASKS LISTED ABOVE AND WILL NEVER SHARE DATA WITH A THIRD PARTY

HOW WE KEEP OUR DATA SECURE

All of our data is kept on a cloud- based server called FileCloud. We have checked their security level and confirmed that they have the below certification

Security ISO 27001

Quality Management ISO 9001

Environmental Management ISO 14001

Occupational Health & Safety Management OHSAS 18001

Business Continuity Management ISO 22301

Energy Management ISO 50001

Our computers are all password protected and we have PANDA Adaptation Defence 360 which is an award-winning system that is more robust at dealing with ransomware and malware.

We use Mailchimp as a vehicle to contact our Club Managers, County Card Holders and Players who have signed up to be kept up to date with tournament information. In a statement they have confirmed that although they had been working to EU-US and Swiss – US Privacy Shield standards they have updated their data processing procedures to become GDPR compliant. They do not engage directly with people on third party data lists.

Our website and e mail are hosted by Intelligent Golf. They have worked tirelessly to update every one of their systems and are now Cyber Essentials certified therefore complying to GDPR. We do not store databases on Outlook.

When sharing data with our Team Managers, Coaches or third part professionals (such as PAYE contractors) we do so via password protected files on our server.

STAFF PROCEDURES

Our staff have been well briefed and are aware of their responsibilities with regards to GDPR. They will only store the data as described in this policy. Whenever a new member of staff is introduced onto the team, they will be made aware of our policy and trained thoroughly in how to be compliant.

Volunteers that have access to data have also been briefed in their responsibilities with regards to the data they have access to.

SUBJECT ACCESS REQUESTS

Any individual submitting a Subject Access Request will be provided with the personal data held on that person. BB&O Golf Limited will ensure that the information is provided promptly and whenever possible within one month of the request.

2nd January 2024

John Kennedy – CEO & Data Protection Officer