



England Golf – World Handicap System (WHS) Privacy Notice

This privacy notice explains how England Golf collects and processes personal data of its Members and Subscribers through their use of The World Handicap System (the “Services”) or the MyEG mobile application software (the “App”). The organisation is committed to being transparent about how it collects and uses that data and in order to meet its data protection obligations.

Where this notice refers to “we”, “our” or “us” this is a reference to the English Golf Union Limited (company no. 5564018) trading as “England Golf” with registered office at The National Golf Centre, The Broadway, Woodhall Spa, Lincolnshire, LN10 6PU, and registered with the Information Commissioner’s Office with registration number Z9405491. For the purpose of data protection laws, we are the controller of the personal data processed for the purposes set out below and we are responsible for looking after it. The term “Member” is used in this notice to refer to an individual who is a member of England Golf through membership of an affiliated club and therefore has a contract of membership with England Golf. The term “Subscriber” is used in this notice to refer to a subscriber to the iGolf scheme.

What information does England Golf collect about you?

If you are a Member we collect the following information about you:

- your name, date of birth, email address, phone number (if provided), membership number, membership type (18 or 9 hole), home club, gender and age;
- information about the courses you play, dates you play, your scores and information relating to your handicap;
- information about competitions you play and your results from such competitions; and
- your England Golf login details.



If you are a Subscriber, we collect the following information about you:

- your name, address, date of birth, email address, phone number, subscriber number, gender and age;
- where you choose to provide it, we will also collect information about your ethnicity, disability and gender identity. This is special category data.
- information about your involvement in golf, such as previous golf club membership, frequency of play and so on;
- information about the courses you play, the dates you play, your scores and information relating to your handicap;
- Your England Golf login details.

If you are a Subscriber, when you make an online payment, the payment data is processed by a third-party payment gateway, called Windcave. Windcave uses the payment data to authorise payment with your card issuer, and it is retained to allow for the further administration of transactions, like refunds, and for reporting. Windcave's privacy notice can be viewed here [<https://sec.windcave.com/pxmi3/privacy-policy>]. Certain transaction information is retained by England Golf such as the card type, expiry date and first and last two digits.

What information does England Golf collect about your device?

- We may automatically collect information and personal data about your computer for system administration including, where available, your IP address, operating system and browser type. We do this to help us analyse how members and subscribers use the login area (including behaviour patterns and the tracking of visits across multiple devices), to establish more about our website users and to assist us in managing your account and improving your online experience.
- Each time you visit one of our sites or use the Services or the App we will automatically collect Personal Data including device, content and usage data. We collect this data using cookies and other similar technologies.



Cookies

We use cookies to distinguish you from other users of the App and our Services. This helps us to provide you with a good experience when you use the App or browse any of our sites or Services and also allows us to improve the App and our sites.

Please see our [website privacy policy](#) for further information about what information may be collected when you visit our website and how you can exercise your choices regarding our use of your cookies.

How we collect personal data?

We collect some of your information directly from you, either through information that you give to us or information that we collect through your communications with us. We also obtain some information from your golf club or clubs of which you have previously been a member.

Information that you give us

You may share personal data about yourself and your circumstances by:

- registering to use the login area of our website or the MyEG App, and continuing to use the login area or App;
- completing a form in relation to a competition organised by us whether in person or online; and
- making enquires or interacting with us directly whether in person, by telephone, or email.

If you are a Member, you are not obliged to provide your personal data to us. However, if you do not provide your personal data to us, we will not be able to provide all services to you, respond to your queries, or allow you onto access the login area. For example, if you do not provide us with your email address and date of birth we will not be able to provide you with a handicap.

If you are a Subscriber, you will only be able to access the benefits of your subscription by providing your personal data to us.



Information that we collect about you and your device

We collect personal data about you when you:

- Use our App, Services or websites;
- submit scores; and
- participate in competitions that we organise; and
- visit our website. Please see our [website privacy policy](#) for further information about what information may be collected when you visit our website.

Information that we receive from other sources

We receive personal data about you from golf clubs which are affiliated to us, from relevant county golf organisations, or via software providers acting on behalf of those clubs or counties.

Why do we need your personal data?

The main purpose for which we use your information is to provide you with your membership or subscription services.

We use your information:

- to provide you with your membership or subscription services;
- to calculate your handicap;
- to run golf competitions;
- to provide you with information that you request from us or which may be of interest to you;
- to notify you about changes to our services;
- to provide member or subscriber support;
- for research about our members' and subscribers' behaviour and our services generally, and to report to bodies such as Sport England; and
- to develop and improve our services, website and platforms
- to govern the sport including maintaining the integrity of the handicap system and to administer appropriate anti-doping, disciplinary and safeguarding functions.

If you are a subscriber, we may:



- use information provided by you to tailor information you may see in the login area and communications we send to you, and to provide information which you may be most interested in.
- Tailor advertisements you may see on your Facebook and other social media platforms so that they are relevant to what England Golf knows about your golf-related interests.
- Undertake analysis and research to gain insight into those interested in golf to improve our products and services and to encourage and grow golf club membership and participation in the sport.

Basis for using your personal data

Legitimate business interests

We have a legitimate interest in processing personal data. We use your personal data as set out in this privacy policy for the legitimate interests of our business to enable us to:

- provide you with and improve our services;
- administrate and maintain the integrity of the handicapping system;
- maintain appropriate membership and subscription records, including records of Subscribers who become Members and vice versa;
- maintain records of disciplinary, anti-doping or safeguarding cases; and
- operate a safe and lawful business.

Where we rely on legitimate interests as the legal basis for processing your personal data, we have considered whether or not those interests are overridden by your interests, fundamental rights and freedoms. We won't use your information if we believe your interests should override ours, unless we have other lawful grounds to do so (such as if we have a legal obligation to process your personal data). If you have any concerns about our processing please refer to details of "Your rights" section below.

As we outline in "Your rights" section below, you will have the right to object to our using your information for our legitimate interests. However, please keep in mind that your objection to this sort of processing will affect our ability to carry out the tasks that we have set out above.



Performance of a contract

Processing may also be necessary for the completion or performance of our contract with you. In order for us to fulfil our obligations under such contract (e.g. to provide you with the benefits of being a member of or subscriber to England Golf), we will need to collect, process and share (as further detailed below) your personal data. Where you are a Subscriber, your payment information will be processed by our merchant services provider whose privacy notice is available on the payment page.

Compliance with a legal obligation

Processing of your personal data may be necessary for compliance with our legal obligations.

Consent

We may also process your personal data on the basis of consent you give, for example to send you certain direct marketing communications or to place certain 'cookies' on your device (please see above).

Who do we share your personal data with?

We may share your personal data with:

For everyone:

- competition organisers and officials involved in competitions in which you take part, including contractors or suppliers acting on behalf of those organisations;
- other organisations involved in the calculation of your handicap, for example where you play at a club we may provide them with your current handicap;
- carefully selected third parties which supply us with products and services, such as website and platform developers and cloud computing services, or other suppliers engaged by us to fulfil our services to you. We will only share your information with these suppliers where it is necessary for them to provide us with the services we need;
- organisations or bodies which help us to govern the sport such as those helping us to carry out our disciplinary and safeguarding functions;



- our professional advisors (including without limitation tax, legal or other corporate advisors who provide professional services to us);
- organisations with whom we have a legal obligation to share your data, which may include regulators, fraud prevention agencies, police, the courts or law enforcement agencies; and
- HMRC or other tax bodies or agencies to comply with our legal and regulatory obligations.

For Members:

- your home club and the relevant county golf organisation, or contractors or suppliers acting on behalf of those organisations;

For Subscribers:

- Social media platforms including Facebook so that we can engage with you via your Facebook or other social media accounts, including by tailoring the advertisements you see on Facebook based on what we know about you and your particular golf related interests
- Other subscribers for the purposes of peer review within the Rules of Handicapping.

Where is your personal data stored?

Your personal data will be stored and processed in the UK and / or the European Economic Area. Your data may be transferred to our platform developer which is based in New Zealand, a country that the European Commission has deemed to provide an adequate level of data protection.

How long will we keep your data?

We will retain your data for as long as it is necessary to fulfil the purposes set out in "Why do we need your personal data?" in this privacy notice. This means that we will keep your personal data for the duration of your membership or subscription with us.

We also keep your personal data for a period of time following your membership or subscription ceasing. Once the data is no longer required for the purposes set out above, the period of retention will be calculated in accordance with our Data Protection Policy. When determining the relevant retention periods, we consider



guidelines issued by relevant data protection authorities, as well as the time periods needed to comply with applicable regulations or laws, to meet regulatory and financial reporting obligations, for tax, accounting and audit purposes, and to fulfil and protect our contractual obligations and rights.

Security

We place great importance on keeping your personal data safe and secure. As such, we put in place appropriate technical and organisational measures / industry standard technology to protect it from unauthorised access and unlawful processing, accidental loss, destruction and damage.

The security measures we use are designed to provide a level of protection security appropriate to the risk of processing your personal data.

You are responsible for protecting your online account login details and must not share them with, or disclose them to anyone. Where you have chosen a password which allows you to login to the login area, you are responsible for keeping this password confidential. We advise you not to share your password with anyone and to use a unique password.

Your rights

You have the right to

- obtain access to, and copies of, the personal data that we hold about you;
- require us to correct the personal data we hold about you if it is incorrect;
- require us to erase your personal data in certain circumstances;
- require us to restrict our data processing activities in certain circumstances;
- receive from us the personal data we hold about you which you have provided to us, in a reasonable format specified by you, including for the purpose of you transmitting that personal data to another data controller;
- object to our processing of personal data held by us about you; and
- withdraw your consent, in circumstances where we rely on it to use your personal data.

We want to make sure that your personal data is accurate and up to date. You have the right to ask for inaccuracies in your data to be corrected, and in certain circumstances for us to stop processing your data or for your data to be erased.



Some of these rights are not automatic, and we reserve the right to discuss with you why we might not comply with a request from you to exercise them.

If you wish to access or amend your data please contact us at compliance@englandgolf.org

If you are not satisfied with how we are processing your personal data, you can complain to the Information Commissioner's Office (ICO). You can also find out more about your rights under the GDPR (and other data protection legislation) from the Information Commissioner's Office website available at: www.ico.org.uk.

Contact us

If you have any queries about this privacy notice or how we process your personal data you may contact our data protection officer:

- Compliance@englandgolf.org;
- Data Protection Officer, England Golf, The National Golf Centre, The Broadway, Woodhall Spa, Lincolnshire, LN10 6PU

Changes to our privacy notice

Any changes to this policy in the future will be posted on this page and, where appropriate, notified to you by email. Please check back frequently to see any updates or changes to this policy.