

# Privacy & Cookie Notice

## GREYSTONES PRIVACY STATEMENT AND COOKIE NOTICE

This Privacy and Cookie Notice provides a high-level overview of our full Privacy and Cookie Notice. (See below for full Privacy and Cookie Notice). It summarises important information regarding how we collect, use, and share any personal information collected.

This Privacy and Cookie Notice applies to personal information collected through this website [www.greystonesgc.com](http://www.greystonesgc.com) which is operated by Greystones Golf Club – one of Ireland’s most prestigious private members club.

Here at Greystones Golf Club we take your privacy very seriously and will only use your personal information to administer your account and to provide the products and services you have requested from us.

### 1. Introduction

- See Point 1 in Full Notice below for more information about Greystones Golf Club

### 2. What is personal information?

- Personal information is information about an identifiable individual, as defined by applicable law.

### 3. Greystones Golf Club collection and use of personal information

- We collect personal information that you choose to provide. This includes information provided when registering with our websites, contacting us, completing surveys or questionnaires, entering competitions, and posting information on public areas of our websites.
- Through your use of this and related websites (including by browsing such sites) you may provide us with personal information such as your name, contact details, personal preferences, and details of your website use.
- By doing so, you are agreeing to our use of that information as set out in this Privacy and Cookie Notice and our full Privacy and Cookie Notice.
- **If you do not agree to these conditions, please do not provide us with this information, or please let us know your objections using the contact details below.**

### 4. Use of cookies on our websites

We also collect information using common Internet technologies such as “cookies” and “clear gifs” (also known as “web bugs” or “web beacons”).

- See point 5 below in Full Privacy and Cookie Notice for more information.

## 5. Use of personal Information/ **What information do we collect about you?**

- We will only use the personal information we collect to provide you with specific information and services that you request, and with additional information and services that may be of interest to you.
- When you join or visit our Golf Club we collect only the information required from you to be able to fulfil our contractual obligations.
- As an employee we collect only the information required to fulfil the contractual relationship between you and the club and we only share this data with internal and external data processors.

## 6. Disclosure of personal Information/**How the information about you will be used.**

• This may involve sharing your personal information with companies that provide services to Greystones Golf Club and certain other third parties, but only where they offer adequate protection for your information and, in certain cases, only where you have provided your consent. When you join as a member or enter into a society event or open competition we may share your information with external and internal data processors (Golf Ireland, Club Systems, and BRS). Your personal data is controlled internally by the club's Data Protection Officer who adheres to the Golf Club's data protection policies and procedures.

- We will share your information with Golf Ireland in order to facilitate the administration of golf, the administration and integrity of handicapping, the identification of candidates to participate in Golf Ireland teams/squads and other similar services. The administration of The World Handicap System also includes making scores available for Peer Review Purposes (See Rule 4.4 of the Rules of Handicapping)

- When you join as a member or enter into a society event or open competition we may share your information with external and internal data processors. Your personal data is controlled internally by the club's Person Responsible for Compliance who adheres to the Golf Club's internal data protection policies and procedures.

- By providing any personal information to us, you fully understand and clearly consent to such use and transfers as set out in this Privacy and Cookie Notice and our full Privacy and Cookie Notice.

## 7. Public (or inactive) areas of our website

- Information that you post on or through the public areas of the site (e.g. chat rooms, bulletin boards and discussion groups) are generally accessible to, and may be collected and used by, others.

## 8. Security

- We take security seriously and take precautions to keep your personal information secure. We have put in place appropriate physical, electronic and managerial procedures to safeguard the information we collect.

- We have no control over the privacy of any communications while in transit to us. We recommend that you not include confidential, proprietary or sensitive information in such communications. See point 9 below in Full Privacy & Cookie statement for more information.

## 9. Unsubscribe, access, questions and further information

- At your request, and where required by law, we will confirm, share, and/or update the personal information we hold about you. However, to protect your privacy we may first have to verify your identity.
- At any time you can choose to make an unsubscribe request to stop receiving marketing information.
- If you would like to unsubscribe from communications from Greystones Golf Club please contact [administration@greystonesgc.com](mailto:administration@greystonesgc.com)

#### • CCTV

Greystones Golf Club has;

- installed a CCTV system which produces clear images which the law enforcement bodies can use to investigate crime and these can easily be taken from the system when required;
- sited cameras so that they provide clear images;
- positioned the cameras to avoid capturing images of persons not visiting the premises;
- sited monitors in a position that provides the staff with the security required;
- placed visible signs showing that CCTV is in operation;
- a limited number of authorised persons that may access the recorded images from the CCTV system, which are securely stored. The recorded images are held for 28 days and with the exception of law enforcement bodies, images will not be provided to third parties.

See point 9 below in Full Privacy & Cookie Notice for more information on your choices.

Contact Us

If you have any comments, queries, or complaints about our collection or use of personal information please contact us via:

- **Post:** Greystones Golf Club, Whitshed Road, Greystones, Co. Wicklow

#### Your rights

You have rights under the GDPR:

- (a) to access your personal data
- (b) to be provided with information about how your personal data is processed
- (c) to have your personal data corrected
- (d) to have your personal data erased in certain circumstances
- (e) to object to or restrict how your personal data is processed
- (f) to have your personal data transferred in a standard format to yourself or to another business in certain circumstances.

You have the right to take any complaints about how we process your personal data to the Data Protection Commissioner:

[www.dataprotection.ie](http://www.dataprotection.ie)

Data Protection Commissioner

Canal House, Station Road , Portarlinton ,R32 AP23 Co. Laois

Telephone: +353 57 8684800

## FULL PRIVACY AND COOKIE NOTICE

### 1. Introduction

This website is operated by Greystones Golf Club (registered in Ireland at registered address Greystones Golf Club, Whitshed Road, Greystones, Co. Wicklow).

All references to 'our', 'us', 'we', or 'company' within this policy and within the opt-in notice are deemed to refer to Greystones Golf Club, its subsidiaries, affiliates, and/or associates, as appropriate.

We endeavour to protect your personal privacy. We provide this Privacy and Cookie Notice to help you to understand what we may do with any personal information that we obtain from you. By providing your personal information to us, you signify your acceptance of our Privacy and Cookie Notice and agree that we may collect, use, and disclose your personal information as described in this Privacy and Cookie Notice. If you do not agree to this Notice, please do not provide your personal details to us. This Privacy and Cookie Notice is incorporated into, and part of, the terms and conditions, that govern your use of the site in general. We will use your information only for the purposes set forth below.

We keep this Privacy and Cookie Notice under regular review and will place any updates on the website. We recommend that you check this page regularly to ensure that you have read the most recent version.

Changes to the Privacy and Cookie Notice are noted here: Date last revised: 24/02/2022

Description of substantive revisions:

Section 2 – Description of personal information

Section 3 – Description of how personal information is collected

Section 4 – Use of cookies and clear gifs

Section 5 – Description of how personal information is used

Section 6 – Description of how personal information is shared

Section 7 – Posting of information in public forums

Section 10 – Changes to your privacy preferences

Section 11 – Description of use of links, references, interfaces, and content from third-party sites

### 2. What is personal information?

Personal information is information about an identifiable individual, as defined by applicable law.

### 3. Collecting personal information

It is your choice to provide us with personal information. We will only collect personal information that you choose to provide. In certain instances, we may provide you with the option to select whether you would like to receive information from us or from trusted third parties (for example, by choosing to opt in to receiving special promotional offers). In some circumstances, you will not have the option to opt out, such as when we are satisfying the obligations of a contract with you, administering a transaction requested by you, or required by law.

You may choose to provide us with personal information if, for example, you: contact us with an enquiry; register on the site; forward an item to a friend; purchase an item; fill out a survey or other form with your personal information included; ask us to provide you with information; enter a competition; post information to public areas of the site; or take advantage of a promotion. By providing any personal information to us, you fully understand and clearly consent to the transfer of such personal information to, and the collection and processing of such information in, other countries or territories. Any such transfer and processing by us will be in accordance with this Privacy and Cookie Notice.

### 4. Cookies

Like many other websites, we use "cookies" to help us gather and store information about visitors to our websites.

A cookie is a text-only string of information that a website transfers to the cookie file of the browser on your computer's hard disk so that the website can remember who you are.

A cookie will typically contain the name of the domain from which the cookie has come, the "lifetime" of the cookie, and a value, usually a randomly generated unique number.

What types of cookies are used on this site?

Types of cookies which may be used on this website;

1. Preference Cookie – At your request we may place a cookie to remember your preferences so that you do not need to re-enter your details (country/age and language preferences) on our gateway page. This is not suitable if you share your computer with someone else.
2. Social Sharing – This is a cookie that identifies you with social networking sites such as Facebook and Twitter and allows interaction between your activity on social networking sites and on our website through your direction, and makes your transition between the sites more seamless.
3. Site Analytics - We use Google Analytics to help analyse use of our website. This analytical tool uses 'cookies', which are text files placed on your computer, to collect standard internet log information and visitor behaviour information in an anonymous form. The information generated by the cookie about your use of the website (including your IP address) is transmitted to Google. This information is then used to evaluate visitors' use of the website and to compile statistical reports on website activity. To opt out of being tracked by Google Analytics across all websites visit <http://tools.google.com/dlpage/gaoptout>

Cookies - We use session cookies, which are temporary cookies that cookies aid the user journey around the site, and will remember preferences you have selected during the session. These cookies are deleted as soon as you leave the site.

4. Content Management cookies – These are cookies required by the site for the content management system to work.

5. Template preference cookies – These cookies are necessary for mobile sites and enable the site to look and feel the way it is intended to.

How do I disable/enable cookies? You have the ability to accept or decline cookies by modifying the settings in your browser. However, you may not be able to use all the interactive features of our site if cookies are disabled.

There are a number of ways to manage cookies. Please refer to your browser instructions or help screen to learn more about these functions. For example, in Internet Explorer, you can go to the Tools/Internet options/Security and Privacy Tabs to adapt the browser to your expectations. If you use different computers in different locations you will need to ensure that each browser is adjusted to suit your cookie preferences.

Some modern browsers have a feature that will analyse website privacy policies and allow a user to control their privacy needs. These are known as 'P3P' features (Privacy Preferences Platform).

You can easily delete any cookies that have been installed in the cookie folder of your browser. For example, if you are using Microsoft Windows Explorer:

- open 'Windows Explorer'
- click on the 'Search' button on the tool bar
- type "cookie" into the search box for 'Folders and Files'
- select 'My Computer' in the 'Look In' box • click 'Search Now' Double click on the folders that are found
- 'Select' any cookie file • hit the 'Delete' button on your keyboard

If you are not using Microsoft Windows Explorer, then you should select 'cookies' in the 'Help' function for information on where to find your cookie folder.

## 5. Use of personal information

We may use personal information collected from you to provide specific services that you request, as well as to provide additional services that may be of interest. For example, we may use your personal information in the following ways:

Transactional purposes. We may use your personal information to respond to your queries and requests, maintain your accounts, and manage transactions such as credit card payments.

Forward to a friend. When you provide us with information regarding another individual, such as when you request that we send someone information from one of our websites, we will

send that individual only the information you specifically requested that we send. We will not send them additional communications based on your providing us with their information. You must certify that your friend is of Legal Purchase Age in the jurisdiction where he/she is located in order for us to transmit the requested information

## 6. Disclosure of personal information

We value your personal information and only share it with third parties that provide it with adequate protection. From time to time we may disclose personal information to:

- (a) third parties to whom you have provided your consent;
- (b) our service providers and subcontractors, including our affiliates, retained to perform functions on our behalf, or to provide services to us (such as credit card and data processing; software development; website hosting and management; information technology and office services; legal, accounting, audit, club professional and other professional service providers; and other services related to our business), provided such service providers and subcontractors do not collect, use, or disclose the personal information for any purpose other than to perform such functions on our behalf, to provide services to us, or as otherwise required by law;
- (c) third parties who, in our reasonable judgment, are providing or seeking the information as your authorized or appointed legal agent; or
- (d) You may have opted in for us to be able to correspond with you regarding our activities including events and competitions by way of post, telephone, email and SMS. We don't share your data with external marketing companies who would contact you this way. If you have consented to this correspondence you can opt out at any time.
- (e) law enforcement, governmental or regulatory agencies, or other third parties in order to comply with applicable law, or where we believe such action is necessary in order to comply with applicable law, or to detect, protect, or defend us and/or other third parties against error, negligence, breach of contract, theft, fraud, or other illegal or harmful activity, to comply with our audit and security requirements, or to audit compliance with our corporate policies, procedures, legal, or contractual obligations.

## 7. Public (or Interactive) areas of our websites

Information that you post on or through the public areas of the site (e.g., chat rooms, bulletin boards, discussion groups, or Social Networking modules) generally is accessible to, and may be collected and used by, others, and may result in unsolicited messages or other contact from others. You should not provide personal information about yourself in public (or interactive) areas of the site. Such personal information is not covered under this Privacy and Cookie Notice.

## 8. Security

We take security seriously and take precautions to keep your personal information secure. We have put in place appropriate physical, electronic, and managerial procedures to safeguard the information we collect. However, we have no control over the privacy of any communications while it is in transit to us. We therefore recommend that you not include confidential, proprietary, or sensitive information in any such communications.

In the unlikely event that we believe that the security of your personal information in our possession or control may have been compromised, we may seek to notify you of that development. If such a notification is appropriate, we will endeavour to do so as promptly as

possible under the circumstances, and, to the extent we have your email address, we may notify you by email.

You are reminded that, in accordance with the Terms and Conditions for this website, which include this Privacy and Cookie Notice, you are responsible for maintaining the strict confidentiality of your account password, and you are responsible for any activity under your account and password. It is your sole responsibility to control the dissemination and use of your password, control access to and use of your account, and notify us when you wish to cancel your account. We will not be responsible or liable for any loss or damage arising from your failure to comply with this obligation.

#### 9. Access, questions and further information

At your request and where the law requires us to do so, if you contact us using the unsubscribe details provided below we will confirm what personal information we hold about you (this will be provided to you in a portable, machine readable commonly used format), update your information, remove your information, fulfil specific opt-out requests (including requests where you previously opted in with respect to the use of your personal information), transfer your personal data in a standard format to another business in certain circumstances and/or correct any inaccuracies in such personal information.

We want to make sure that your personal information is accurate and up to date. You may ask us to correct or erase information that you think is inaccurate. At the time of collecting data you have the right to object to the Club holding certain information about you.

If you have any privacy-related questions, concerns or complaints, please contact: The Person Responsible for Compliance, Greystones Golf Club, Whitshed Road, Greystones, Co. Wicklow.

#### 11. Interfaces with Third-Party Websites

The site may contain links, references, and content from other websites outside of our control. Please be aware that we have limited or no control over these websites and our Privacy and Cookie Notice does not apply to these sites. We encourage you to read the Privacy and Cookie Notices and terms and conditions of any linked, referenced, or interfacing websites you enter.

This Privacy and Cookie Notice will be supplemented by additional legal requirements in the jurisdiction where we conduct business as required. Nothing in this Privacy and Cookie Notice or otherwise will create, or add to, any right or claim (whether legal, equitable, or otherwise) that any individual or person may have at law or otherwise against the company or any third party, or any of their respective directors, officers, employees, agents, or representatives (collectively the "Greystones Golf Club"), nor will the existence of this Privacy and Cookie Notice or its application impose or add to any obligations upon or create any liability for the Greystones Golf Club that it does not already otherwise have under law.

Greystones Golf Club  
Whitshed Road ,  
Greystones ,  
Co. Wicklow  
All rights reserved.

## **Greystones Golf Club GDPR Members' Statement:**

Greystones Golf Club holds personal information on all of our Members, and indeed on past Members. The term Members covers all categories of Membership. Generally, this information is:

Name, Address (and potentially previous addresses), Date of Birth (and therefore age), Gender, Golf Ireland Handicap information, Some Bank Details (generally the Club does NOT hold complete Bank account details for Members), Financial data on Club activities (eg. Monies spent in the Bar using the Club cards), Pictures (usually of Team Members and/or Competition Winners or participants), Data relating to term of Membership (date joined, date Membership category changed etc.), Application forms, which will include names of Proposers and Seconders, Occupation (and potentially previous Occupation) and finally contact information (phone numbers, email addresses, etc)

The Club maintains this data in a combination of electronic and paper formats. Most data is held in perpetuity. This is required to prove future generations are related to past Members. Any Financial data is held for a minimum of 7 years, to comply with Financial Regulations. This data has been provided voluntarily by members in the past.

The Club does NOT and WILL NOT share this data with any commercial organization except for the following:

Handicap data is shared via the Golf Ireland and BRS system.

Club account finance information (balance information only), and handicap information is shared with the Club Professional.

Club account finance information is shared with the Catering Suppliers (who have access to balance information only).

Membership information is shared with Golf Ireland and providers of Insurance.

Media outlets (for competition results and Team Membership).

Names are shared with Sponsors (when awarding prizes, they usually like to know who the winners are)

The Club also, from time to time, publishes data on Members' activities on the Club website.

The Club are committed to protecting Members' data but we are obliged to obtain Members' permission to use this data, but only in the manner outlined above. Members should note that they must explicitly provide this permission. Without this permission, it is illegal for the Club to use such information in any way.

Club Administration staff who have access to the membership information in the course of their normal duties should sign a Non-Disclosure Agreement. All electronic data should be stored on the Club Servers only, and paper-based data should be stored in a secure location, accessible to authorised staff only.

The Club undertakes to provide any Member who requests it, copies of all relevant personal data held, and to delete this data should the Member so request, and such data is not needed for Club Operations.

## **Greystones Golf Club GDPR Members' Statement:**

Visitors' data is shared via the Golf Ireland and BRS system for the purpose of administering competitions, timesheets and handicapping.

CCTV is in operation (see above)

The Club has appointed a Data Protection Officer, Liam Moulton, [liam@greystonesgc.com](mailto:liam@greystonesgc.com).