Powfoot Golf Club GDPR Policy (Scotland)

1. Who We Are

- **Powfoot Golf Club** is the "Data Controller" for the personal information you provide to us.
- Our registered address is Powfoot Golf Club, Cummertrees, Annan, DG12 5QE and our ICO Registration Number is Z5846818
- For data protection queries, contact our Data Protection Lead or Committee at info@powfootgolfclub.com

2. What Information We Collect

- **Members:** Full name, address, email, phone number, date of birth, gender, emergency contact details, bank/direct debit details, CDH number, and golf handicap/scoring history.
- **Visitors & Guests:** Name, email, phone number, home club, CDH number, tee-time booking details, and payment transaction records.
- **Juniors:** Parent/guardian contact details, medical/allergy information (for coaching/camps), and photo/video consent forms.
- **Staff & Volunteers:** Contact details, National Insurance numbers, payroll/tax information, next of kin, and PVG check confirmations (where applicable).
- **Facility Security:** CCTV images around the clubhouse/car park and door/locker entry logs.

3. Why We Use Your Data (Lawful Bases)

- **Contractual Necessity:** To administer your membership, process green fees, manage tee-time bookings, and run club competitions.
- **Legal Obligation:** To comply with HMRC tax laws, health and safety regulations, licensing laws (e.g., clubhouse bar), and Scottish safeguarding legislation.
- **Legitimate Interests:** To send essential club updates (AGMs, course closures, newsletters), maintain clubhouse security via CCTV, and manage club governance.
- **Explicit Consent:** To send third-party marketing offers, publish photographs of juniors, or store medical notes. You may withdraw consent at any time.

4. Who We Share Your Data With

- **Governing Bodies:** Scottish Golf Ltd (for WHS handicapping, CDH management, and affiliation) and Area/County Golf Associations.
- **Software & Service Providers:** Our club management, tee-booking, and EPOS providers (e.g., ClubV1, BRS Golf, IntelligentGolf, IG, or DotGolf), as well as payment processors (e.g., GoCardless, Stripe, EVO, AMEX etc).

- **Legal & Regulatory Bodies:** HMRC, Disclosure Scotland, our club insurers, and emergency services if required.
- *We never sell your personal data to third parties.*

5. How Long We Keep Your Data (Retention Schedule)

- **Active Membership Records:** Retained for the duration of your membership, plus **3 to 6 years** after you leave (to handle any late queries or returning members).
- **Financial & Bar/POS Records:** Retained for **6 years** plus the current financial year to comply with HMRC rules.
- **Visitor Tee-Time Bookings:** Retained for **1 to 2 years** for operational and accounting reconciliation.
- **CCTV Footage:** Automatically overwritten after **30 days**, unless required for an active security or police investigation.
- **Accident & Incident Logs:** Retained for **3 years** (or until a junior turns 21) for insurance purposes.

6. Your Rights Under UK GDPR

- Under UK data protection law, you have the right to request access to your data (Subject Access Request), ask us to correct inaccurate details, request deletion of your data (where we have no legal obligation to keep it), or object to direct marketing.
- If you are unhappy with how we handle your data, you have the right to lodge a complaint with the **Information Commissioner's Office (ICO)** via ico.org.uk or their Scotland office in Edinburgh (0303 123 1115).