



England Golf Privacy Notice

This privacy notice explains how England Golf collects and processes personal data of its Members and Subscribers and iPlay Users through their use of The World Handicap System (the "Services") or the MyEG mobile application software (the "App"), and of those using the England Golf website.

Where this notice refers to "we", "our" or "us" this is a reference to the English Golf Union Limited (company no. 05564018) 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. We are committed to being transparent about how we collect and use that data in order to meet our data protection obligations.

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. The term "iPlay User" is used to refer to a user of the iPlay service on the MyEG mobile application. The term "Website User" is used to refer to an individual using non-login areas of the England Golf website.

Some individuals may interact with England Golf in other ways, for example by entering an England Golf Championship, or by joining our Captains Programme. Other privacy notices may apply to these interactions.

What information does England Golf collect about you?

The following sections set out the personal information England Golf may collect about you, what that information will be used for and the lawful basis for doing so.



Information that we collect from you.

Member		
Information	Why do we need it	Our lawful basis
<p>Your name, date of birth, email address, phone number (if provided), membership number, membership type (18 or 9 hole) home club, communication preferences, gender and age</p>	<p>To provide you with membership services.</p> <p>To calculate your Handicap Index.</p> <p>To run golf competitions.</p> <p>To provide you with information that you request from us or which may be of interest to you.</p> <p>To notify you about changes to our services.</p> <p>To provide member support.</p> <p>For research about our Members' behaviour and our services generally, and to report to bodies such as Sport England and other stakeholders.</p> <p>To develop and improve our services, website and platforms.</p> <p>To govern the sport, including maintaining the integrity of WHS™</p>	<p>We have a legitimate business interest to use your personal data to:</p> <p>Provide you with and improve our services.</p> <p>Administer and maintain the integrity of WHS™.</p> <p>Maintain appropriate membership records, including Members who become Subscribers or iPlay Users and vice versa.</p> <p>For the purposes of disciplinary, anti-doping or safeguarding cases, including maintaining records of those cases.</p> <p>Operate a safe and lawful business.</p> <p>Processing of this information is necessary for us to provide you</p>



	and to administer appropriate anti-doping, disciplinary and safeguarding functions.	with services to which you are entitled as part of your contract with us. In some cases, we may have a legal obligation to process this personal information.
Information about the courses you play, dates and times you play and submit your scorecard, your scores, information about who attests your scores, and any scores that you attest.	To calculate your Handicap Index. For research about our Members' behaviour and our services generally. To effectively govern the sport.	Legitimate business interests. Performance of a contract. In some cases, we may have a legal obligation to process this personal information.
Information about competitions you play in and your results from such competitions.	To calculate your Handicap Index. For research about our Members' behaviour and our services generally. To effectively govern the sport.	Legitimate business interests. Performance of a contract. In some cases, we may have a legal obligation to process this personal information.
Where you choose to provide it, special category data for the	For research about our Members' behaviour and our services generally,	We process this personal information on the basis of consent that you give to us.



purpose of equality and diversity monitoring.	and to improve our services. To report to bodies such as Sport England and other stakeholders.	
Your England Golf login details.	To provide you with our services.	Legitimate business interests. Performance of a contract.

Subscriber		
Information	Why do we need it	Our lawful basis
Your name, date of birth, email address, residential address, phone number, membership number, communication preferences, gender and age.	To provide you with subscription services and determine your eligibility for those services. To calculate your Handicap index. To run golf competitions. To provide you with information that you request from us or which	We have a legitimate business interest to use your personal data to: Provide you with and improve our services. Administer and maintain the integrity of WHS™. Maintain appropriate subscription records, including Members who become Subscribers or iPlay Users and vice versa. For the purposes of disciplinary, anti-doping or safeguarding cases, including maintaining records of those cases Operate a safe and lawful business.



	<p>may be of interest to you.</p> <p>To notify you about changes to our services.</p> <p>To provide Subscriber support.</p> <p>For research about our Subscribers' behaviour and our services generally, and to report to bodies such as Sport England and other stakeholders.</p> <p>To tailor information you may see in the login area and communications we send to you, and provide information you may be most interested in.</p> <p>To develop and improve our</p>	<p>Understand the behaviour and requirements of those participating in golf to enable us to better provide for, represent and grow the game.</p> <p>Processing of this information is necessary for us to provide you with services to which you are entitled as part of your contract with us.</p> <p>In some cases, we may have a legal obligation to process this personal information.</p>
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	<p>services, website and platforms.</p> <p>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.</p> <p>To govern the sport, including maintaining the integrity of WHS™ and to administer appropriate anti-doping, disciplinary and safeguarding functions.</p> <p>Undertake analysis and research to gain insight into those interested in golf to improve our products and services and to</p>	
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	<p>encourage and grow golf club membership and participation in the sport.</p>	
<p>Information about your involvement in golf, such as previous golf club membership, frequency of play and so on.</p>	<p>For research about our Subscribers' behaviour and our services generally, and to report to bodies such as Sport England and other stakeholders.</p> <p>To determine your eligibility for our services.</p> <p>To tailor information you may see in the login area and communications we send to you, and provide information you may be most interested in.</p> <p>To develop and improve our</p>	<p>Legitimate Business Interest.</p>



	<p>services, website and platforms.</p> <p>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.</p> <p>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.</p>	
<p>Information about the courses you play, the dates and times you play, your</p>	<p>To calculate your handicap.</p> <p>For research about our subscribers'</p>	<p>As part of our contract to provide you with services.</p> <p>Legitimate business interest.</p>



<p>scores, information relating to your handicap, information about who attests your scores, and any scores that you attest.</p>	<p>behaviour and our services generally.</p> <p>To effectively govern the sport.</p>	
<p>Where you choose to provide it, special category data for the purpose of equality and diversity monitoring.</p>	<p>For research about our subscribers, and our services generally, and to improve our services.</p> <p>To report to bodies such as Sport England and other stakeholders.</p>	<p>We process this personal information on the basis of consent that you give to us.</p>
<p>Your England Golf login details.</p>	<p>To provide you with our services.</p>	<p>Legitimate business interests.</p> <p>Performance of a contract.</p>
<p>Your payment details.</p>	<p>To process your payments for our services.</p>	<p>Performance of a contract.</p> <p>When you pay for your Subscription online, the card payment data you submit is processed by a third-party payment gateway called Windcave.</p>



		<p>We retain some of your payment data such as the card type, card holder's name, expiry date, and the first and last two digits of the card number. The data that England Golf keeps cannot be used to authorise any further payments from you to us.</p> <p>Windcave uses the payment data that you enter to authorise the payment with your card provider. Windcave also retains that payment data to make repeat transactions such as Subscription renewals, refunds, and for reporting purposes.</p> <p>You can find out more about how Windcave uses your personal data by viewing their privacy policy on the following link:</p> <p>https://sec.windcave.com/pxmi3/privacy-policy</p>
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iPlay User		
Information	Why do we need it	Our lawful basis
Your name, date of birth, email address, residential address, phone number, membership number, communication preferences, gender and age.	<p>To provide you with iPlay services.</p> <p>To provide you with information about your golf.</p> <p>To provide you with information that you request from us or which</p>	<p>We have a legitimate business interest to use your personal data to:</p> <p>Provide you with and improve our services.</p> <p>Maintain appropriate iPlay user records, including Members who</p>



	<p>may be of interest to you.</p> <p>To notify you about changes to our services.</p> <p>To provide user support.</p> <p>For research about our users' behaviour and our services generally, and to report to bodies such as Sport England and other stakeholders.</p> <p>To tailor information you may see in the login area and communications we send to you, and provide information you may be most interested in.</p> <p>To develop and improve our services, website and platforms.</p> <p>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.</p> <p>To govern the sport and to administer</p>	<p>become Subscribers or iPlay Users and vice versa.</p> <p>For the purposes of disciplinary, anti-doping or safeguarding cases, including maintaining records of those cases</p> <p>Operate a safe and lawful business.</p> <p>Understand the behaviour and requirements of those participating in golf to enable us to better provide for, represent and grow the game.</p> <p>Processing of this information is necessary for us to provide you with services to which you are entitled as part of your contract with us.</p> <p>In some cases, we may have a legal obligation to process this personal information.</p>
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	<p>appropriate anti-doping, disciplinary and safeguarding functions.</p> <p>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.</p>	
<p>Information about your involvement in golf, such as previous golf club membership, frequency of play and so on.</p>	<p>For research about iPlay users' behaviour and our services generally, and to report to bodies such as Sport England and other stakeholders.</p> <p>To determine your eligibility to use iPlay.</p> <p>To tailor information you may see in the login area and communications we send to you, and provide information you may be most interested in.</p> <p>To develop and improve our services, website and platforms.</p>	<p>Legitimate Business Interest.</p>



	<p>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.</p> <p>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.</p>	
<p>Information about the courses you play, the dates and times you play, your scores and information relating to your golf.</p>	<p>To provide you with iPlay user services.</p> <p>For research about our subscribers' behaviour and our services generally.</p> <p>To effectively govern the sport.</p>	<p>As part of our contract to provide you with services.</p> <p>Legitimate business interest.</p>
<p>Where you choose to provide it, special category data for the purpose of equality and diversity monitoring.</p>	<p>For research about our iPlay Users, and our services generally, and to improve our services.</p>	<p>We process this personal information on the basis of consent that you give to us.</p>



	To report to bodies such as Sport England and other stakeholders.	
Your England Golf login details.	To provide you with our services.	Legitimate business interests. Performance of a contract.

Website User
We will not ask you to provide us with any personal information when you browse those areas of our website that do not require you to log in.

Information we collect about your device

For Everyone		
Information	Why do we need it	Our lawful basis
Each time you visit one of our sites we will automatically collect device, content and usage data, and data relating to the IP address, operating system and browser type used by your device. We collect this data using cookies and	To understand those who are using our services and the way in which they use the, so that we can improve and maintain those services and to improve your online experience. Undertake analysis and research to gain insight into those interested in	We have a legitimate business interest to understand the behaviour and requirements of those participating in golf to enable us to better provide for, represent and grow the game, to effectively govern the game (including our



other similar technologies.	golf to improve our products and services and to encourage and grow golf club membership and participation in the sport.	anti-doping, disciplinary and safeguarding functions), and to operate a safe and lawful business.
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Members, Subscribers and iPlay Users		
Information	Why do we need it	Our lawful basis
When you login to our Services or the App we will automatically collect device, content and usage data, and data relating to the IP address, operating system and browser type used by your device.	<p>To understand those who are using our services and the way in which they use the, so that we can improve and maintain those services and to improve your online experience.</p> <p>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.</p> <p>Assist us in managing your account, to help us analyse how individuals</p>	We have a legitimate business interest to understand the behaviour and requirements of those using our services and participating in golf to enable us to better provide for, represent and grow the game, to effectively govern the game (including our anti-doping, disciplinary and safeguarding functions), and to operate a safe and lawful business.



	use the login area (including behaviour patterns and the tracking of visits across multiple devices) to establish more about our users and assist us in managing your account and improving your online experience	
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Information we receive from other sources.

Members, Subscribers, iPlay User		
Information	Why do we need it	Our lawful basis
Information from golf clubs or facilities that are affiliated to us, from county golf organisations (including via software providers acting on behalf of those organisations), and from non-affiliated golf facilities about your membership (past or present) the courses you play, the dates and times you play, your scores and information relating to your golf.	To provide you with our services. To effectively govern and maintain the integrity of the sport, to administer appropriate anti-doping, disciplinary and safeguarding functions.	As part of our contract to provide you with services. Legitimate business interest.



<p>We may receive information from other third parties such as other golf bodies, other sports bodies, representative bodies, schools, colleges, universities, law enforcement, testing providers, data providers, regulatory bodies and such other reputable third parties with whom we have relationships. We may combine information we receive with other information which we hold about you.</p>	<p>To effectively govern and maintain the integrity of the sport, to administer appropriate anti-doping, disciplinary and safeguarding functions.</p>	<p>Legitimate business interest.</p>
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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 or event we may provide the club or organiser with your current handicap;
- If you play golf in another country, we may provide information to the national governing body, federation or other relevant organisation to enable you to use your Handicap Index® whilst playing abroad. This is know as "interoperability";



- 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 anti-doping, 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. You are a member of those organisations as well as England Golf, and they will have a role to play in the administration of your Handicap Index®;

For Subscribers and iPlay Users:

- 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. You can restrict the amount of information other Subscribers can see using the settings in the My Account area of the App or online platform.

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.

Updated: 8 September 2023