

## Royal Portrush Golf Club Privacy Policy: Members & Visiting Members

1. **General.** Royal Portrush Golf Club understands that your personal information (data) is important to you and valuable to others: it can influence what people think of you and their decisions about you. Starting on 25 May 2018, we will process data in a different fashion to meet new legislation<sup>1</sup>. This policy explains when and why we collect personal information, how we use it, the conditions under which we may disclose it to others and how we keep it secure. Every effort has been made to make this policy clear and concise. If anything is unclear, please contact the Data Protection Officer (DPO) whose details are set out at Annex A.
2. **Philosophy.** The new legislation is not just about processes but also about people. It will change how people gather, process and destroy your data. You will feel a change in how Royal Portrush Golf Club delivers its operations so that they are legally compliant. An example is that unless they have the explicit consent of a member or individual, they will not share their details with another member. Our simple message is that we're committed to protecting and respecting your privacy and would ask you to bear with us as we all become accustomed to this new culture.
3. **Roles and Responsibilities.** Just as you have a responsibility to provide us with information that is accurate, we have a responsibility to protect and process information in accordance with the law. Those responsible, and their defined responsibilities, are set out at Annex A.
4. **The Types of Personal Data We Gather and Use.** We will use your personal data to establish if we can provide you with information, services and conduct our business operations effectively. The data we need will vary depending on the services you request and our ability to provide them. We have identified a considerable amount of data that is gathered, processed and exchanged with you, to provide internal and external services. The data can be broken down into four broad categories with examples shown in the respective annexes to this document:
  - 4.1. **Public.** This is data that is already public or which you make public;
  - 4.2. **Personal.** This is data that makes you readily identifiable as a living person;
  - 4.3. **Sensitive (Special Category).** This is data is normally termed as Sensitive, but you may some refer to it as Special Category. It would not normally be shared by you as it has the capacity to cause discrimination if used inappropriately: it will be normally protected by encryption. It is categorised by type at Annex B.
  - 4.4. **Special Category.** There are two types of data:
    - 4.4.1. **Financial Data.** Whilst not sensitive data, financial data that is misused has the capability to cause significant harm to the subject, therefore Enterprise NI will carefully protect such data with strong encryption.
    - 4.4.2. **Criminal Convictions/Offences.** Normally we do not gather or process this information unless there is a legal reason to do so e.g. Safeguarding. The data, if held, will be protected by strong encryption.
  - 4.5. **Likely Data Held.** We have summarised much of the data that we do process and it is set out at Annex B.
5. **Providing Your Data.** In the majority of cases we will process data as the result of four sets of circumstances set out in the new legislation:
  - 5.1. *A contractual basis*, such as the supply of goods and/or services or if the Club is considering such a relationship:

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<sup>1</sup> EU General Data Protection Regulation (GDPR) 2016, UK Data Protection Act (DPA) 2018.

- 5.1.1. As part of the relationship with members, potential members, corporate bodies, visitors and/or their legal representatives and funders;
  - 5.1.2. The Supplier relationship where they provide you with goods and/or services e.g. Pro Shop, Bar & Restaurant;
  - 5.2. *As a consequence of legal obligations* where we have to act in accordance with the law and/or statutory bodies established by the law e.g. HMRC, Council, PSNI, HSENI, Insurance Companies, Safeguarding Board.
  - 5.3. *Legitimate Interests*. This is where we share a common interest in the exchange of data and/or services with another e.g. GUI, R&A, European PGA, equipment suppliers. If using “Legitimate Interest” as a basis, we will conduct a “balance-test” to ensure that there is balance between your rights & freedoms and our business needs.
  - 5.4. *Consent*. In those circumstances where information is optional, we will advise you and ask for your consent to hold to process it. This may be to process information where there is no other legal basis or it is required e.g. Club flyers/magazines, marketing material or sharing information about new products/services.
6. **Using your Personal data: the legal basis and purposes.** When we establish our membership with you as a member or visitor, we will explain the legal basis for gathering and processing your data using clauses 5.1-5.4. Different services may require a different basis for data processing and use. Royal Portrush Golf Club will process your data, as necessary. The basis and planned purpose for such processing will normally be based upon:
- 6.1. To provide a service to you, or another who you have the legal authority to represent, **in preparation for, or conduct/delivery of, a contracted service or services** with you, or a client company, by:
    - 6.1.1. Taking preliminary action, at your request, prior to entering a membership<sup>2</sup> contract to establish if use of our services can be provided;
    - 6.1.2. Determining whether Royal Portrush Golf Club and the user can meet their relative obligations;
    - 6.1.3. Entering, managing, implementing and monitoring a contract;
    - 6.1.4. Updating the data necessary to plan for, implement and effectively deliver the contract;
    - 6.1.5. Initiating, maintaining and updating the necessary records, ensuring their accuracy;
    - 6.1.6. Managing the account, including any financial transactions;
    - 6.1.7. Processing any special category information about you, or another who you have the legal authority to represent, related to special categories of data (Article 9 GDPR) necessary for the safe and effective conduct of the contract;
  - 6.2. Meet our **legal or regulatory obligations** by:
    - 6.2.1. Complying with legal and regulatory requirements, including but not limited to:
      - 6.2.1.1. Disclosure requests;
      - 6.2.1.2. Activities related to the prevention, detection and investigation of crime including fraud and money-laundering;
      - 6.2.1.3. Verification of identity and credit status;

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<sup>2</sup> Can be as a member, temporary member, visitor or corporate member/sponsor.

- 6.2.2. Working with public authorities in connection with the discharge of a public task;
  - 6.2.3. Establishing and defending legal rights;
  - 6.2.4. Meeting your legal rights under data protection legislation including access requests;
  - 6.2.5. Monitoring communications and activities.
- 6.3. For our joint **Legitimate Interests**, or those of other persons and Royal Portrush Golf Club, to:
- 6.3.1. Monitor work-related communications including (but not limited to) emails, faxes, letters, texts, telephone calls with you, and on your behalf, with clients, goods/service providers and statutory bodies;
  - 6.3.2. Permit good governance, management, accounting and audit of our business operations;
  - 6.3.3. Conduct appropriate searches in preparation for submission of applications for jobs and/or programmes/projects on your behalf (but not exclusive to):
    - 6.1.1.1. Establish the veracity of qualifications, professional memberships and references;
    - 6.1.1.2. Credit reference agencies and partner organisations;
    - 6.1.1.3. Undertake psychometric and/or skills testing, prior to potential employment opportunities;
  - 6.1.2. Establishing new services, organically or with the assistance of an external partner;
  - 6.1.3. Send you prospective opportunities, conduct analysis and develop statistics.
- 6.2. Obtain your **Consent** to:
- 6.2.1. Maintain effective communications with you in your preferred format/s, or another/others who you have the legal authority to represent, to;
    - 6.2.1.1. Send you communications related to Royal Portrush Golf Club's activities;
    - 6.2.1.2. Market Royal Portrush Golf Club's services;
    - 6.2.1.3. Send personal data to third-parties, when requested by you or those you are authorised to represent;
    - 6.2.1.4. Share your details with third-parties;
  - 6.2.2. You can withdraw your consent for these uses at any time by advising us.
7. **Sharing**. When we establish the relationship, we will explain the legal basis for sharing data. Information will only be shared on a "Need to Know" basis and then using means designated by Royal Portrush Golf Club as secure. This information is held, used and shared by us, to:
- 7.1. Meet our contractual agreement with you; to provide member services;
  - 7.2. Comply with government and regulatory bodies legally authorised to request such information, or to whom we are required to submit data;
  - 7.3. Conduct business operations with:
    - 7.3.1. Employees/Workers & Consultants;
    - 7.3.2. Contract managers;
    - 7.3.3. Service delivery partners;

- 7.3.4. Our members and clients in specific sectors to whom:
  - 7.3.4.1. You have authorised data release;
  - 7.3.4.2. You have expressed a preference to participate with in a programme/project;
- 7.4. When directed by the Courts to enable the administration of justice;
- 7.5. To direct-market products and services, advise you of news and industry updates, events, promotions and competitions, reports and other information related to your preferences. Where we do so, you will be able to unsubscribe from such communications;
- 7.6. Payment systems to permit the transfer of personal data in order that financial transactions may be undertaken;
- 7.7. To undertake future business planning and management of the Club;
- 7.8. Conduct market research in order to improve our services;
- 7.9. Meet legal and statutory requirements;
- 7.10. Implement sharing with your consent, including a request for data transfer.
- 8. **Data Retention.** Royal Portrush Golf Club have identified likely data for retention and set this out in our data retention and erasure policy. This is briefly summarised as:
  - 8.1. **In the event of membership queries.** We will retain your data for only so long as reasonably necessary (normally 12 months after membership concludes) to deal with your queries associated with:
    - 8.1.1. Contact details;
    - 8.1.2. Financial information;
    - 8.1.3. Playing history.
  - 8.2. **In the event of claims.** We will retain your data for only so long as you might bring legal claims against us (normally 6 years) and health & safety data (for 40 years);
  - 8.3. **Legal & Regulatory Requirements.** We will retain your data for so long as we are required by law or regulatory requirements. These periods may change subject to the introduction of or amendment of statutes, regulations or caselaw.
- 9. **Data Pseudonymisation, Encryption & Anonymisation.** Royal Portrush Golf Club will, at the earliest opportunity, take measures to increase the security of your data using:
  - 9.1. **Pseudonymisation;** We will use these tools to increase data protection and reduce risk of a breach;
  - 9.2. **Encryption.** We will encrypt sensitive or special category data;
  - 9.3. **Anonymisation.** Once data is anonymised, you will not be able to request access to it as we will no longer be able to personally identify it.
- 10. **Data Protection.** Royal Portrush Golf Club has decided to put in place a number of safeguards to provide oversight of the data that it acquires and holds. Members should be aware of these responsibilities.
  - 10.1. **Executive Committee.** An Executive Committee member will hold, within their portfolio of responsibilities, oversight of data protection;
  - 10.4. **Officers & Managers.** Elected Officers and Managers will:
    - 10.4.1. Implement, monitor and enforce data protection within the Club, irrespective of the functional area/responsibility;

- 10.4.2. Test security measures within their own departments/areas of responsibility to ensure their ongoing effectiveness;
- 10.4.3. Conduct DPIAs when considering the introduction of, or amendment to, an existing process to ensure that privacy is designed in as part of the programme or project outputs/outcomes.
- 10.4.4. Alert their line manager and the DPO, within 24 hours, to any data security breach that leads to or is caused by:
  - 10.4.4.1. Accidental or unlawful destruction;
  - 10.4.4.2. Loss;
  - 10.4.4.3. Alteration;
  - 10.4.4.4. Unauthorised disclosure of or access to, personal data transmitted, stored or otherwise processed.
- 10.4.5. Transmit within 72 hours, to the DPO, any:
  - 10.4.5.1. Request for access (Subject access request), which may be verbal, written or electronically submitted without delay;
  - 10.4.5.2. Request by a subject to exercise any of their other rights under GDPR, DPA 2018, or any other data protection legislation;
  - 10.4.5.3. Complaint by a data subject or their authorised representative.
- 10.4.6. Induct, train and develop their people to adhere to current data protection legislation related to written or electronic data;
- 10.4.7. Maintain the physical security of assets related to data protection;
- 10.4.8. Authorise the transfer, or sharing, of data in accordance with data protection legislation and Club policies.
- 10.5. **Data Protection Officer (DPO).** As a Club with many members and employees, an individual will be appointed as DPO and hold this responsibility as part of their role and responsibilities. This individual will:
  - 10.5.1. Be independent and have no role in setting our data policies and procedures.
  - 10.5.2. Have direct access to the Chief Executive and be resourced in their role;
  - 10.5.3. Be developed to conduct the role;
  - 10.5.4. Scrutinise our policies, procedures and safeguards.
  - 10.5.5. Advise on Personal Information Assessments (PIA);
  - 10.5.6. Advise our Directors on data protection measures and risks;
  - 10.5.7. Coordinate training of our people in data protection procedures;
  - 10.5.8. Coordinate policies and procedures to safeguard electronic and “hard” copy information held by Royal Portrush Golf Club e.g. files, print-outs, CVs, written job applications, notebooks.
  - 10.5.9. Conduct audits on our policies and procedures to test their effective implementation including business continuity plans and data breaches;
  - 10.5.10. Liaise with the Information Commissioner’s Office or appropriate Supervisory Authority on changes in statutory/regulatory requirements and potential breaches in our safeguards;

- 10.6. **Information Systems Manager/Provider (ISM).** The ISM will:
- 10.6.1. Manage Electronic Information systems e.g. Computers and mobile devices capable of processing and storing electronic data;
  - 10.6.2. Electronic Storage devices, in the office and remotely sited;
  - 10.6.3. Manage electronic safeguards for our systems e.g. Firewalls, software updates, anti-virus etc
  - 10.6.4. Advise the DPO and Board on risks and protective measures;
  - 10.6.5. Coordinate training of our people in data protective procedures with DPO;
  - 10.6.6. Conduct audits on our electronic information systems to test their protection and detect unauthorised use/intrusions.
  - 10.6.7. Utilise servers within the EEA, and outside<sup>3</sup>, to store your data that meet GDPR standards;
- 10.7. **Officers/Employees/Workers/Associates.** Individual officers, employees/workers and contracted associates are responsible for:
- 10.7.1. Adhering to the legislation governing data protection;
  - 10.7.2. Enforcing Club policies and procedures related to data protection;
  - 10.7.3. The physical and electronic protection of documentation and electronic devices, storage media, especially that which has been used to record a subject's data categorised as personal or sensitive. This protection is not just against unauthorised electronic access but also against copying, reproduction, theft, physical access, or observation of the personal information contained thereon.
- 10.8. **Data Subjects.** Royal Portrush Golf Club will protect data subject/s information against compromise, using both active and passive measures, and will not divulge personal data to any third-party without prior, legal, authorisation.
- 10.9. **Suppliers/Clients.** Royal Portrush Golf Club will require clients and suppliers to sign a contract confirming their responsibilities for the protection of data shared with them, authorised by you, in accordance with data protection legislation.
- 10.10. **Joint Controllers and Processors.** The obligations, responsibilities and liabilities of joint controllers and processors will be set out in contracts with joint controllers and processors.
11. **Consent.** When **Royal Portrush Golf Club** relies on your explicit consent to carry out processing operations, they will use a layered approach. This will involve:
- 11.1. **Verbally.** An officer or employee advising you that:
- 11.1.1. We require your consent and recording your agreement by date and time on our records;
  - 11.1.2. The relevant data protection policies<sup>4</sup> can be accessed either on the Club website or by request, less those that provide technical detail on data protection measures.
  - 11.1.3. Your rights to withdraw that consent at any time by informing us verbally, electronically or in writing: that withdrawal will be also recorded in the same fashion;
  - 11.1.4. The specific use for the data that is gathered;

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<sup>3</sup> If stored outside UK and/or EEA, these servers will comply with the GDPR standard or EU Privacy Shield.

<sup>4</sup> Information Security Management; Privacy Policies; Retention & Erasure Policy.

- 11.1.5. Who the data will be shared with;
  - 11.1.6. How long it will be retained before erasure;
  - 11.2. In Writing/Electronically.
    - 11.2.1. Completing an “opt-in” box;
    - 11.2.2. Directing you to the relevant Club policies (see clause 7.1.2);
    - 11.2.3. Informing you of your rights to withdraw that consent at any time by informing us verbally, electronically or in writing;
    - 11.2.4. The specific use for the data that is gathered;
    - 11.2.5. Who the data will be shared with, if anyone;
    - 11.2.6. How long it will be retained before erasure;
  - 11.3. **Written.** This will be gathered, in electronic or hard copy, in a contract of membership, employment/for services or Terms of Business Agreement, with the member, employee contractor or client company. These documents will explain the basis for processing, uses, recipients etc. They will not rely on Consent but utilise as the legal basis for processing, Contractual Obligation, Legal Obligation and/or Legitimate Interests.
  - 11.4. **Electronically.** In the case of marketing preferences, you will be asked to give electronic assent by confirming agreement with an “opt-in” box for email, post, text and postal correspondence. This will be renewed annually should you wish us to retain or distribute relevant information. We will require this to be submitted from an email address, uniquely identifiable to a person e.g. gerald@business.org.uk.
  - 11.5. **Young People.** Royal Portrush Golf Club is aware of its responsibility to guard young and vulnerable people who are members and will adhere to the age limits set in the DPA 2018. It will seek consent from legal guardians where the age limit is not met. In the case of vulnerable adults, the Club and its officers/representatives/managers will explain the subject’s rights in such terms as they can be understood and acknowledged by the individual unless vital interests are affected.
12. **Transfers of Data Outside UK.** Data will not be transferred outside the UK unless:
- 12.1. **Within EU/EEA.** You authorise it and the recipient satisfy the criteria set in the DPA 2018 and EU criteria as an “adequate” third-party country;
  - 12.2. **Outside EU/EEA.** You authorise it and the recipient satisfy the criteria set in the DPA 2018 and EU criteria as an “adequate” third-party country;
  - 12.3. **USA.** You authorise it and the recipient must be registered with the USA Department of Commerce under EU-US Privacy Bill;
  - 12.4. Your prior agreement will not be sought where the Club is acting under the direction of law enforcement bodies or the Courts.
13. **Retention Periods for Data.** Royal Portrush Golf Club will only retain the information necessary to conduct its contracted business and meet legal obligations. Once information is irrelevant, it will be disposed of/destroyed/electronically erased in accordance with our Retention and Erasure Policy and summarised below. On occasions, the Club may retain information until a matter is fully closed.
- 13.1. To meet our contractual obligations with you (normally up to 12 months after the cessation of membership/a contract);
  - 13.2. To meet statutory or regulatory obligations (normally up to 7 years);

- 13.3. For business purposes (normally up to 3 years).
14. Other Rights. Clients have other rights:
- 14.1. **Accuracy.** A client has the right that any information or data held, related to them, is accurate. It is the responsibility of the controller and/or processor to update such information once they become aware that it is inaccurate. Clearly, until a member, employee, client or their agent, makes the processor aware of an inaccuracy, updating cannot be carried out.
- 14.2. **Access.** You have the right at any time to ask us for a copy of the information supplied by you that we hold with a Subject Access Request. We will ask you to verify your identity and may ask for more information about your request. We cannot release information that relates to other people or businesses as this would counter their privacy rights.
- 14.3. **Erasure.** You may request, at any time, that information related to you is erased/deleted from our database/records and we will comply so long as it does not prevent us from meeting our statutory or regulatory commitments. We will record your request and whether you do not wish to be contacted in the future: a record of objectors will be retained in a suppression list to remove the possibility of this occurring.
15. **"Cookies".** A "cookie" is a commonly used automated data collection tool. They are small text files that are used to identify when you are browsing a particular website or open a HTML-formatted email. They can be used to detect what technology makes the website function more efficiently. You can choose to set your web browser to refuse cookies<sup>5</sup>, or alert you when cookies are being sent. These will allow us to:
- 15.1. Tailor information presented to you based on your browsing preferences e.g. language, geographical region;
- 15.2. Collect statistics regarding your visit to our website;
- 15.3. Provide Royal Portrush Golf Club with business and marketing information;
- 15.4. Improve our customer service: this information will allow us to improve the effectiveness of our website and emails;
- 15.5. Respond to information requests;
- 15.6. To send you emails in response to our request for periodic product/service information or advantage of marketing communications;
- 15.7. We may collect personal identification information from Users in a variety of ways, including, but not limited to, when Users visit our Site, register on the Site, subscribe to our mailing list, fill out a form, and in connection with other activities, services, features or resources we make available on our Site. Users may be asked for (as appropriate) **name, email address, mailing address and contact number/s**.
- 15.8. Users may, however, visit our website anonymously. We will collect personal identification information from Users only if they consent to share such information with us. Users can always refuse to supply personal identification information, except that it may prevent them from engaging in certain related activities.
- 15.9. To implement your request to initiate, amend or cancel communication between Royal Portrush Golf Club and you.
- 15.10. We may collect non-personal identification information about Users whenever they interact with our Site. Non-personal identification information may include the browser name, the type of computer and technical information about Users means of

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<sup>5</sup> Cookies to include web beacons, pixel tags, scripts and similar technologies on our website and emails.



connection to our Site, such as the operating system and the Internet service providers' utilised and other similar information.

16. **Changes to our Privacy Policy.** This privacy policy may be changed by Royal Portrush Golf Club at any time. If we change our privacy policy in the future, we will advise you of changes or updates to our privacy policy *by a prominent notice on our website*. For a period of 30 days before, and at least 30 days after, the implementation date of any change, we will advise clients that there has been a change and refer them to the policy, which can be made available to clients in writing on request. Continued use of our website or our services after such changes will constitute your acceptance of such changes.
17. **Diversity & Inclusion.** Royal Portrush Golf Club is an equal opportunities employer and a company committed to diversity. This means that all officers, members and employees will receive equal treatment and that we will not discriminate on grounds of gender, marital status, race, ethnic origin, colour, nationality, national origin, disability, sexual orientation, religion or age. As part of our commitment to equal opportunities we may from time to time use information provided by you for the purposes of equality monitoring and submission to statutory bodies as required under FEAT (NI) Order 1998 and other legislation. All such information will be used on an anonymised basis.
18. **Complaints.** Whilst you have the right to take a complaint about how we manage your data directly to the ICO, Royal Portrush Golf Club encourages you to raise any complaints initially with a Manager or the DPO. You will be issued an Incident Control Number to maintain data security and refer to throughout the complaint. You can contact Royal Portrush Golf Club or raise queries using the information at Clause 16.
19. **Queries.** If you have any questions about this Privacy and Cookie Policy, the practices of this site, or your dealings with this Site, please contact us at:  
[XXXXX@royalportrushgolfclub.com](mailto:XXXXX@royalportrushgolfclub.com) at the below address:

Chief Executive  
Royal Portrush Golf Club  
Dunluce Road  
PORTRUSH  
BT56 8JQ

**CONTACT DETAILS FOR RESPONSIBLE PEOPLE & RESPONSIBILITIES**

**1. Data Controller:**

Royal Portrush Golf Club  
Dunluce Road  
PORTRUSH  
BT56 8JQ  
Tel: +44 (0) [28 7082 2311](tel:2870822311)

**2. Council.** The Council member with responsibility for the governance of data protection is:

**(Council Member/Role)**

Royal Portrush Golf Club  
Dunluce Road  
PORTRUSH  
BT56 8JQ  
Tel: +44 (0) [28 7082 2311](tel:2870822311)

Email: (email address)

**3. Data Protection Officer.** The Data Protection Officer can be contacted as follows:

Data Protection Officer  
Royal Portrush Golf Club  
Dunluce Road  
PORTRUSH  
BT56 8JQ  
Tel: +44 (0) [28 7082 2311](tel:2870822311)  
Email: (email address)

**3. Responsibilities.**

- a. Royal Portrush Golf Club: the “Data “Controller”;
- b. Our people (employees/workers) who gather, and use, the information operate under the instructions of our Data Controller;
- c. Associates who operate on our behalf are defined as “Data Processors”: they operate in accordance with our written instructions and are contractually required to adhere to the same standards of data protection as our employees/workers;
- d. Others who we are authorised, by you, to share information with are also defined as “Data Processors” including the providers of our Information System;
- e. Those others who also gather information independently, as well as sharing our information, or use that information to form professional opinions, or reach conclusions, become “Data Controllers” in their own right.
- f. In some circumstances, Royal Portrush Golf Club operates as data processors for other stakeholders/partners.

**MEMBERS & CLIENTS: POSSIBLE PERSONAL INFORMATION GATHERED & HELD**

<b>Serial</b>	<b>Data</b>	<b>Personal</b>	<b>Sensitive/ Special Category</b>	<b>Comments</b>
1	Membership/Account Number	✓		
2	Company/Public Authority/Funder's name	✓		If corporate funding
3	Representative first name, surname and previous names (if used)	✓		Previous Names if necessary
4	Service Contract	✓		If Applicable
5	Contact details for those approving payments	✓		If Applicable
6	Bank Details of Funder		✓	If Applicable
7	Business References	✓		If required
8	Credit Reference Check		✓	If necessary
9	Name of person holding financial authority	✓		If Applicable
10	Insurance Certificates	✓		PLI/ELI/PII/Motor Insurance etc (as required by law)
11	Completed Membership Application Form	✓	✓	
12	Member's Name and Date of Birth	✓		
13	Member's contact address, telephone numbers, email address	✓		
14	Contact details for Client's nominated Next of Kin (NoK)/Emergency Contact	✓		
15	Photograph of Member	✓		As required
16	Disabilities/Allergens		✓	
17	Bank Details		✓	
18	Guardian's Consent Form	✓		If under 13.
19	Booking Forms	✓		
20	Disclaimers	✓		
21	Minutes of relevant Meetings	✓		
22	Membership Correspondence/Investigations re Service Planning, Delivery & Evaluation	✓		
23	Safeguarding (Young/Vulnerable)		✓	
24	Membership Card	✓	✓	

## **SENSITIVE DATA CATEGORIES (GDPR ARTICLE 9)**

Personal data which describes the following characteristic/s of an individual:

1. Racial or Ethnic origin;
2. Political opinion or affiliation;
3. Religious or philosophical belief;
4. Trades Union membership;
5. Genetic or biometric data;
6. Health-related;
7. Sexual orientation/lifestyle.

## **SPECIAL CATEGORY (GDPR ARTICLE 10)**

Personal data which is related to the criminal convictions, offences or security-related security measures.

## **ADDITIONAL INFORMATION TREATED AS SPECIAL CATEGORY BY THE CLUB**

Personal data which is related to their financial transactions or financial relationships.