

This privacy notice explains, how TORREGOLF.EU uses the personal information we collect about you, either through using our website, or in any other ways be that, electronically, verbally or in writing.

TORREGOLF.EU exist as a membership based "club" - whom organise golfing events throughout the year in Spain's Costa Blanca. To that end - we will collect details (specified below) of persons who through their own free will - wish to become members of our "club" - to gain the benefit of lower green fee rates and the comradery of playing alongside fellow members. The details we collect are the bare minimum we need to operate this "club".

Data Controller

TORREGOLF.EU, is a data controller

Basis for collecting your data? (lawful processing)

In organising golfing events for our members we need to collect Names, Emails, Addresses, Dates of Birth, Phone Numbers and Handicap Data for our listed members.

Data privacy laws define the basis by which we can lawfully collect and process personal data. For our data processing purpose, we have determined the following ...

Legitimate Interest

To collect and process personal data where it is in the legitimate interest of TORREGOLF.EU to do so. We will use legitimate interest in relation to our members specifically in order to communicate with members about any upcoming events.

As a member your name will be displayed on the TORREGOLF.EU website handicap listing and booking system which are only available to members with the password to access that section of the website.

Our blog pages contain photos and reports of each past Event and these reports could mention your name and or show you in our regular photo shot/s for each Event.

If you object to this, please advise us, by email, from the TORREGOLF.EU contact page.

The data collected will not be used for any unlawful or unethical purpose.

Marketing

TORREGOLF.EU does not undertake any marketing activities. We will only communicate with you about events and updates in relation to those events to which you (as a member) have decided to attend.

No member details will be passed to any third party for any marketing purposes whatsoever.

As a data subject receiving communications via email, you have the right to object to receiving communications from us and will have the option to opt out on every email you receive. Our commitment should you choose opt out is to then cease the transmission of emails to you with immediate effect. This could mean, however, termination of your membership to TORREGOLF.EU as the information specified in the Data Controller Section (above) is vital for the operational purposes of TORREGOLF.EU on a day/month/yearly basis.

Recipients of Data and Data Transfers

Personal information is shared with third party service providers (processors). TORREGOLF.EU utilises 'cloud hosted' services to conduct business and provided services such as the email tool used - namely Google : <https://policies.google.com/privacy>

Data is transferred within the EEA and the USA. The USA's 'Privacy Shield' data protection framework has been approved by the EU data protection working party to process EU citizen personal data.

Sensitive Information

TORREGOLF.EU does not process sensitive data as defined by Article 9 of the GDPR.

Categories and Type of Personal Data Collected

TORREGOLF.EU processes non-sensitive data.

We process the following data of our members:

Name

Phone number

Home/Holiday Address

Date of birth

Email address

Golf Handicap Data

In addition, we collect data in relation to your communications and interaction with us. This can include emails, text messaging, postal service delivery, social media posting or other any other form of communication. In addition to the lawful purpose described previously for the above categories, we have a legitimate interest to collect and retain this communication data to enable and improve our communication and for record keeping purposes.

Retention Policy

The data we collect directly from you is the minimum we require to facilitate the lawful processing described above. Personal Identifiable Data placed on our system will be deleted in accordance with legal obligations. Outside of that TORREGOLF.EU has developed a retention policy to ensure personal data is held only for as long as is required for the purpose we collected it or for our legitimate purposes.

Basically if you decline to renew your TORREGOLF.EU membership - your records are then deleted from our current member system - we have absolutely no cause to retain the details of ex-members. However it could be possible that prior email correspondence, and some mention of a name or an individual photo or group photo on our website blog could exist after a members exit.

Data Storage and Security

We store data within our electronic cloud hosted system specifically our Google Email system and other Google products (forms and sheets).

Google Privacy & Terms : <https://policies.google.com/privacy>

Your Rights as a Data Subject

The Regulations provide a number of rights to you as the Data Subject. TORREGOLF.EU is committed to upholding those rights and those applicable to the personal information we collect and those processes are listed below. In addition to these rights, you have the right to escalate any concern to the Supervisory Authority, which in the UK is the Information Commissioners Office (<https://ico.org.uk>). A full and detailed explanation of all rights can be found at <https://ico.org.uk/for-the-public/>.

The Right to be Informed – you should be clear about what, why and in what way your personal information will be processed at the time it is processed. This privacy policy sets out that information.

Right of Access – you have the right to know what personal information is held, by whom and why.

The Right to Rectification – If the information we have collected and processed is inaccurate or incomplete, you have the right to have it rectified.

Right to Erasure – You have the right to have your personal data erased and to prevent processing in some specific situations.

Right to Restrict Processing - If you contest the accuracy of the personal data we hold, we will restrict the processing of your data until accuracy is verified.

Right to Data Portability – You have the right to move, duplicate or transfer your data easily from one IT environment to another in a safe and secure way.

Right to Object – You have the right to object to profiling and direct marketing.

You also have rights in relation to automated decision making.

You also have the right to lodge a complaint with the UK's supervisory body, The Information Commissioners Office www.ico.org.uk.

Automated decision making and profiling

defined by the GDPR : *'profiling' means any form of automated processing of personal data consisting of the use of personal data to evaluate certain personal aspects relating to a natural person, in particular to analyse or predict aspects concerning that natural person's performance at work, economic situation, health, personal preferences, interests, reliability, behaviour, location or movements'*.

TORREGOLF.EU does not conduct any profiling or any automated decision making.

Third party websites

Our website may contain links to other websites. This privacy policy only applies to TORREGOLF.EU, if you follow a link to another website from the TORREGOLF.EU website, you should endeavour to seek out the privacy policy of that website yourself.

Changes to our privacy policy

We keep our privacy policy under review and will place any updates on our website. This privacy policy was last updated on the 26th March 2019

How to contact us

Please use the Contact Page on our website.