

## Introduction and General Policy

Faithlegg Golf Resort Limited provides Golf, Bar and Restaurant and Golf Retail facilities to its customers who are defined as being its membership base, potential members and guests.

This policy relates to the processing activities of Faithlegg Golf Resort Limited, the owner of the above referenced facilities and the website [faithlegggolfclub.com](http://faithlegggolfclub.com).

We (Faithlegg Golf Resort Limited) take the utmost care to ensure that the personal information we obtain from you to enable us to provide these services and facilities is not used in a way that you are unaware of or not agreeable to you.

Please read this policy carefully as it is intended to clearly set out to you how your personal data that is collected by us is processed by us. By submitting your information, you confirm that we are authorised to process it on your behalf in accordance with this Privacy Policy.

Please note that from time to time, supplementary privacy notices may be provided to you where we wish to provide you with additional information in relation to our data processing activities. These privacy notices should be read in conjunction with this policy and are not intended to supersede this main privacy policy.

**Note:** This policy [does not relate](#) to the processing activities of the club organisation itself. E.g. activities of club committees, club officers etc.

## Our identity as Data Controller

Faithlegg Golf Resort Limited is part of the FBD Hotel and Resorts Group ([www.fbdhotels.com](http://www.fbdhotels.com)). Faithlegg Golf Resort Limited is a Data Controller.

If you have any questions or comments about this policy, please address these to the Data Protection Administrator by any of the following mediums;

Phone	+353 51 382000
Email	<a href="mailto:DPA@faithlegg.com">DPA@faithlegg.com</a>
Business Address	Faithlegg Golf Club, Faithlegg, Co. Waterford, Ireland

## What personal information is Collected?

Unless otherwise agreed with you, we will only collect basic personal data about you, which does not include any special categories of personal information about you.

Generally speaking, at the time you submit personal information or make a request, the intended use of the information that you submit will be apparent in the context in which you submit it and/or because the website or form states the intended purpose.

Your information may also be provided to us via a third party, but not in a way that you would not expect. E.g. your personal data may be provided from nearby hotels (to include Faithlegg House Hotel) where we have commercial agreements for accommodation and golf packages.

We have prepared the following table to indicate the main categories of personal data we process.

## 1) Data Sourced from the website or via any other direct interaction with you.

Category of Personal Data	Data Subject (Generally)	Types of Personal Data Collected
General Identity Information	Golf Club Member, Guest, Supplier or general customer of the company	Examples would be;  Name, Address, Mobile Phone Number, Gender, Email Address, Previous Golf Clubs, Handicaps, Competition Data etc
Financial Information	Golf Club Member, Guest, Supplier or general customer of the company	Credit/Debit Card or Bank Account Details for Direct Debits
Relationship Data	Golf Club Member, Guest, Supplier or general customer of the company	May involve survey responses, customer testimonials or complaints
CCTV	Public at Large	CCTV Data is collected throughout the grounds of the golf facility.
Marketing and Loyalty Preferences	Our Customers and Potential Customers	Opt-Out Preferences for Marketing Communications.
Your Preference Information / Information you have provided to us	May be any person that interacts with us	Examples would be;  Function/Event Set-Up preferences, tee time preferences, buggy preferences, allergen information etc  Generally, includes data that you have asked us to process on your behalf or where we have asked you to provide to us to improve our service levels and your customer experience.

## 2) Data Sourced from the Website (Only)

Category of Personal Data	Data Subject (Generally)	Types of Personal Data Collected
Technical Data (to compile statistical data via cookies)	Anyone that uses our website or uses our on-site wi-fi facilities	IP Address, Browser Type, Access Time and referring URL

We only ask that you disclose enough personal data as is necessary to;

- consider and process your application for membership to the golf club,
- process a booking with us for golf or the associated services we offer,
- respond to you as comprehensively as possible where you have asked us a question, made a comment or a suggestion or requested additional information about us,
- manage our ongoing relationship with you, our member, guest, supplier or customer,
- contact you in relation to future marketing initiatives and golf promotions,
- improve the quality of your visit to our website or our golf facilities,
- enable us to function as a business, but while always ensuring that any privacy impact to you, the data subject, is minimised and that there is a fair balance between our rights as a data controller and your rights as a data subject.

## **Website Cookie Summary**

Website usage information is collected using Cookies. This information may be used to help us improve our site and the services we offer. Cookies are small text files that a site transfers to a visitor's hard disk or browser for added functionality or for tracking site usage. In order to measure the effectiveness of our online presence, faithlegggolfclub.com may use cookies to determine the path users take on our site and to identify repeat visitors of our site. We do not use cookies to gather personal information such as a person's name or e-mail address.

## **Why do we collect your personal information?**

We may process your personal data for many different reasons.

- 1) To comply with our legal and statutory obligations
- 2) To enter into and perform a contract for a product or a service with you
- 3) To enable us, acting in our legitimate interests, to function as a business
- 4) To enable us to carry out any processing activity of your personal data, where that processing activity requires us to obtain your consent.

We have prepared the following table to explain this in more detail to you.

Legal Basis of Processing	Explanation/Examples
1) To Comply with legal and statutory obligations	We operate within a wide ranging legislative framework that requires us provide a duty of care to our customers. We process personal data to ensure that we meet these obligations.
2) To enter into and perform a contract for a product or a service	<p>Generally, our customers use our website to enquire about and to make bookings for golf related services.</p> <p>These bookings bind us contractually and there is a necessity for us to process certain personal data in order to fulfil our obligations under the contract.</p> <p>For example, you may receive</p> <ul style="list-style-type: none"> <li>- a confirmation email from us in relation to your booking</li> </ul>
3) To enable us, acting in our legitimate interests, to function as a business	<p>Examples of us processing your data under this basis include;</p> <ul style="list-style-type: none"> <li>- Where you have signed up as a member of any of our loyalty schemes or golf club, we may contact you from time to time in relation to benefits and advantages to you as a member of the scheme(s) or club to include the renewal of any memberships.</li> <li>- Except where we are relying on your consent for the purposes of processing personal data for marketing purposes, we process personal data for marketing purposes as is necessary for the purpose of our legitimate interests in promoting our products and services, subject to any opt-out preferences you notify us of in respect of electronic direct marketing communications.</li> </ul> <p>Please be aware that you may object at any time to us processing your personal data under our legitimate interests as a data controller by;</p> <ul style="list-style-type: none"> <li>a) contacting us directly at the details provided above or</li> <li>b) simply choosing the 'opt out' option on any communication from us.</li> </ul>

Legal Basis of Processing	Explanation/Examples
4) Where you have provided your consent for us to process your data.	<p>It will be clear to you when you are providing consent to us to process your personal data as you will be the person providing us with that express consent. Examples would include;</p> <p>-Where you have expressly indicated to us your wish to receive our marketing communications</p> <p>Please be aware that where processing of your data is based on consent <b>you have the absolute right to withdraw your consent at any time.</b></p>

### **What will happen if I do not provide personal data?**

If we require your personal data, for example, where we intend to enter into a contract with you, and you fail to provide us with this data, we may not be able to perform our obligations under our contract with you. e.g. book you a tee time, or process a membership application.

### **Children's Privacy & Parental Consent**

Please be aware that Faithlegg Golf Club has not designed this site for and does not intend for it to be used by, anyone under the age of 18. Parental Consent is required for junior golf membership applications.

### **International Transfers**

Where we require your personal data to be processed outside of the EEA (European Economic Area) we will ensure that your data is protected under the Privacy Shield Regime. i.e. is afforded the same level of protection as the EU.

### **What do we do with your personal information?**

All personal data we hold about you will be processed by our staff in Ireland, unless otherwise indicated.

We do not sell, rent or share your personal information to any third party joint promoters, nor use it for any unapproved commercial purposes.

On occasion, where it is necessary, we may need to share basic personal data with third parties in;

- order to satisfy applicable laws and regulations, as part of a legal process or where a valid request has been made by a public body e.g. An Garda Síochána for CCTV footage
- order to allow us to perform our obligations under a contract. For example;
  - Provide your details to club committees and the club professional etc to allow them to manage and administrate the club function

- make bookings for you at nearby golf courses that we have reciprocal arrangements with etc.
- connection with a merger, acquisition, sale corporate reorganisation or other changes in corporate control.
- order to ensure that events, functions or large group bookings are hosted efficiently, your personal data may be shared with the event, function or group booking organiser.
- relation to the general management and administration of the FBD Hotels and Resorts Group where personal data may be shared with our Head Office, or parent companies.
- relation to the management of our business where we may share your personal data with professional advisors in the areas of IT, Legal, Insurance, Banking etc.

### **Third Party Note re Faithlegg House Hotel**

Please note that the third party known as Faithlegg House Hotel Limited (Trading as Faithlegg) is also part of the FBD Hotels & Resorts Group. This company owns and operates the hotel facilities within the Faithlegg Estate.

Faithlegg Hotel and Faithlegg Golf Club combine (*under the control of the same ultimate parent company*) to provide the overall offering to the public that is widely known as Faithlegg House Hotel and Golf Club.

On occasion, and only where it is necessary, personal data may be shared with Faithlegg Hotel Limited. Faithlegg Hotel Limited is a separate data controller of this personal data. Please refer to Faithlegg.com to view their privacy policy.

### **External links**

Our website may contain links to other third-party sites, plug-ins and applications. Please take note that we are not responsible for, nor has any control over the privacy policies or practices of such other sites. We encourage our users to be aware when they leave our site and to read the privacy policies of each and every site that collects personally identifiable information. This privacy policy applies solely to information collected and processed by us.

Similarly, Faithlegg Golf Club is not responsible for, nor has any control over the privacy policies of the wi-fi operators at Faithlegg Golf Club.

### **Security of your information**

Faithlegg is committed to protecting the information we collect. When you enter personal data during the online reservation process, or during a customer email sign-up, your data is protected by Secure Socket Layer technology (SSL) to ensure safe transmission.

All site servers are configured with data encryption technologies and industry-standard firewalls to ensure our site is hosted in a secure environment.

## **Secure Reservations**

If you decide to make an online reservation at the Site, you will be linked to a reservation interface and a third party booking engine provided by our booking management system vendor BRS Golf. All information sent to this site, if in an SSL session, is encrypted, protecting against disclosure to third parties.

## **Protecting your information**

We would like our Site visitors to feel confident about using the Site to plan and purchase their tee times, so Faithlegg Golf Club is committed to protecting the information we collect. Faithlegg Golf Club has implemented a security program to keep information that is stored in our systems protected from unauthorized access.

Measures have been put in place to ensure that your personal data can only be accessed where there is a business need for them to access same.

## **How long do we retain your information?**

Personal Data provided by you that ultimately results in you becoming a customer of the business, is considered by us as being part of the books and records of the business which we are required under law to retain for a period of 6 years.

Generally, we will retain all personal data securely and for as long as is necessary to ensure that we comply with the relevant legislative environment that we in the leisure sector operate in.

Please note that if you consent to being contacted for marketing and promotion purposes, any personal information we use for this purpose will be retained by us until you notify us that you no longer wish to receive this information.

## **Your Rights**

You have the right to

- request from us access to, rectification or erasure of your personal data or restrict processing concerning your data.
- withdraw consent for the processing of your personal data at any time, where relevant.
- object to the processing of your data as well as the right to data portability.
- have your personal data erased if we do not have a legitimate reason for processing same.
- You also have the right to lodge a complaint with The Data Protection Commission where you consider that the processing of your personal data by us infringes the General Data Protection Regulation 2018.

## **Policy Modifications**

Faithlegg Golf Club reserves the right to change this Privacy Policy at any time. Please revisit our site from time to time to view any material changes to this policy.