



# Sussex Golf Captains

Associate Members Sussex County Golf Union

Honorary Secretary

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Set out below is the Sussex Golf Captains code of practice on data protection, which accords with the Data Protection Act 1998. It relates to all personal data whether held in written or electronic form.

## 1. INTRODUCTION

The Sussex Golf Captains (“SGC”) needs to process certain information about its individual members (“data subjects”). In so doing the SGC must comply with the Data Protection Act 1998 (“the Act”).

The Act contains eight basic principles. These state that personal data must:

- Be obtained and processed fairly and lawfully and shall not be processed unless certain conditions are met or the data subject has given his consent to the processing.
- Be adequate and kept up to date.
- Be accurate and kept up to date.
- Not be kept for longer than is necessary for that purpose.
- Be processed in accordance with the data subject’s rights.
- Be kept safe from unauthorised access, accidental loss or destruction.
- Not be transferable to a country outside the European Economic Area, unless
- that country has equivalent levels of protection for personal data.

The SGC must ensure that the data protection principles and the law under the Act are followed and fully implemented. In order to facilitate this, the SGC has developed a code of practice on data protection. The references to personal data made within this document apply to all data held on all data subjects of the SGC, including members and officials.

## 2. DEFINITIONS

### 2.1 Personal Data

**2.1.1** This is information about a living individual, who is identifiable from the information, or who could be identified by the information combined with other data, which the SGC has or may have in the future. This includes names and addresses, telephone numbers and e-mail addresses.

### 2.2 Sensitive Personal Data

**2.2.1** The Act distinguishes between “ordinary” personal data such as name, address and telephone number and “sensitive personal data”. Information relating to racial or ethnic origin, political opinions, religious beliefs, trade union membership, health, sex life, criminal convictions.

**2.2.2** The SGC will not process sensitive personal data on its members.

## **2.3 Electronic Data**

**2.3.1** For the avoidance of doubt, electronic data encompasses not just personal data held on the SGC databases but, for example all emails, letters and other documents held on disk or anywhere on the SGC email system.

## **3. THE SUSSEX GOLF CAPTAINS DATA PROTECTION POLICY**

### **3.1 Subject Consent**

**3.1.1** It is a condition of membership of the SGC that all Members give their consent to the processing of their data by the SGC.

### **3.2 Retention of Data**

**3.2.1** It is not in the interest either of data subjects or of the SGC to retain unnecessary information. The SGC does, however, retain some data relating to Members and past Members in their stored files so that the SGC can keep historical information as required for management purposes.

**3.2.2** It is the SGC policy not to retain personal data for longer than is needed.

### **3.3 Access to Data**

**3.3.1** Members who are data subjects of the SGC will on most occasions have the right to access personal data that is being kept about them either on computer or in 'relevant' filing systems. This will normally be provided in the form of copies of the personal data or a report of the data held, depending on the type and format of the original data.

**3.3.2** A member who wishes to exercise this right should contact the Honorary Secretary of the SGC.

**3.3.3** Where required to do so under the Act, the SGC aims to comply with requests for access to personal information from data subjects as quickly as possible but will ensure that it is provided within 40 days from the date of request.

## **4. CONCLUSION**

**4.1** Any questions or concerns about the interpretation or operation of this policy should be taken up with the SGC designated data controller who is the Honorary Secretary of the SGC;

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