
PRIVACY NOTICE

BACKGROUND:

We understand that your privacy is important to you and that you care about how your personal data is used. We respect and value the privacy of all of our clients and/or website users and will only collect and use personal data in ways that are described here, and in a way that is consistent with our obligations and your rights under the law.

1. Information About Us

Silverstone Golf Club Ltd:

A private limited company registered in Scotland under company number SC165230;

Registered office: 100 Queen Street, Glasgow, Scotland, G1 3DN;

Trading address: Silverstone Golf Club, Silverstone Road, Stowe, Buckingham, Bucks, MK18 5LH;

Email address: enquiries@silverstonegolfclub.co.uk;

Telephone number: 01280 850005.

2. What Does This Notice Cover?

This Privacy Information explains how we use your personal data: how it is collected; how it is held; and how it is processed. It also explains your rights under the law relating to your personal data.

3. What Is Personal Data?

Personal data is defined by the General Data Protection Regulation (EU Regulation 2016/679) (the "GDPR") and the Data Protection Act 2018 (collectively, "the Data Protection Legislation") as 'any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier'.

Personal data is, in simpler terms, any information about you that enables you to be identified. Personal data covers obvious information such as your name and contact details, but it also covers less obvious information such as identification numbers, electronic location data and other online identifiers.

4. What Are My Rights?

Under the Data Protection Legislation, you have the following rights, which we will always work to uphold:

- a) The right to be informed about our collection and use of your personal data. This Privacy Notice should tell you everything you need to know, but you can always contact us to find out more.
- b) The right to access the personal data we hold about you. Part 10 tells you how to do this.
- c) The right to have your personal data rectified if any of your personal data held by us is inaccurate or incomplete.
- d) The right to be forgotten, i.e. the right to ask us to delete or otherwise dispose of any of your personal data that we hold.
- e) The right to restrict (i.e. prevent) the processing of your personal data.
- f) The right to object to us using your personal data for a particular purpose or purposes.

- g) The right to withdraw consent. This means that, if we are relying on your consent as the legal basis for using your personal data, you are free to withdraw that consent at any time.
- h) The right to data portability. This means that, if you have provided personal data to us directly, we are using it with your consent or for the performance of a contract, and that data is processed using automated means, you can ask us for a copy of that personal data to re-use with another service or business in many cases.
- i) Rights relating to automated decision-making and profiling. We do not use your personal data in this way.

For more information about our use of your personal data or exercising your rights as outlined above, please contact us using the details provided in Part 12.

It is important that your personal data is kept accurate and up-to-date. If any of the personal data we hold about you changes, please keep us informed as long as we have that data.

Further information about your rights can also be obtained from the Information Commissioner's Office or your local Citizens Advice Bureau.

If you have any cause for complaint about our use of your personal data, you have the right to lodge a complaint with the Information Commissioner's Office but we would welcome the opportunity to resolve your concerns ourselves.

5. What Personal Data Do You Collect and How?

We may collect and hold some or all of the personal data set out in the table below, using the methods also set out in the table. We do not collect any 'special category' or 'sensitive' personal data, personal data relating to children nor data relating to criminal convictions and/or offences.

Data Collected	How We Collect the Data
Identity Information including name.	We use different methods to collect data from and about you, including through: Correspondence. You may give us your name and correspondence information by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you: <ul style="list-style-type: none"> • Book a room, a restaurant table, a round of golf or other function; • Subscribe to our publications; • Request marketing to be sent to you.
Contact information including address, email address and telephone numbers.	
Payment information including card details and bank account numbers.	
Marketing and communication information including preferences on receiving information from us.	
Aggregated Data such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or	
Automated technologies or interactions. As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies and other similar technologies. Third parties or publicly available	

<p>indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy notice.</p>	<p>sources. We may receive personal data about you from various third parties and public sources as set out below:</p> <ul style="list-style-type: none"> • Social Media sites such as LinkedIn; • Your own website or public profiles such as blogs; • Business lists or attendance lists from events.
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6. How Do You Use My Personal Data?

Under the Data Protection Legislation, we must always have a lawful basis for using personal data. The following table describes how we may use your personal data, and our lawful bases for doing so:

What We Do	What Data We Use	Our Lawful Basis
Administering our business.	Identity, contact.	(a) Legitimate interests (for running our business); (b) To comply with a legal obligation.
Supplying our services to you.	Identity, contact, financial.	(a) Performance of a contract with you; (b) Legitimate interests (to recover debts due to us).
Managing payments for our services.	Identity, contact, financial.	(a) Performance of a contract with you; (b) Legitimate interests (to recover debts due to us).
Personalising and tailoring our services for you.	Identity, contact, marketing & communication.	Legitimate interests (to develop our services and grow our business).
Communicating with you.	Identity, contact, marketing & communication.	(a) Consent; (b) Performance of a contract with you; (c) Legitimate interests (to develop our services and grow our business).

With your permission and/or where permitted by law, we may also use your personal data for marketing purposes, which may include contacting you by email, telephone, text message and/or post with information, news, and offers on our services. You will not be sent any unlawful marketing or spam. We will always work to fully protect your rights and comply with our obligations under the Data Protection Legislation and the Privacy and Electronic Communications (EC Directive) Regulations 2003, and you will always have the opportunity to opt-out. We will always obtain your express opt-in consent before sharing your personal data with third parties for marketing purposes and you will be able to opt-out at any time.

We will only use your personal data for the purpose(s) for which it was originally collected unless we reasonably believe that another purpose is compatible with that or those original purpose(s) and need to use your personal data for that purpose. If we do use your personal data in this way and you wish us to explain how the new

purpose is compatible with the original, please contact us.

If we need to use your personal data for a purpose that is unrelated to, or incompatible with, the purpose(s) for which it was originally collected, we will inform you and explain the legal basis which allows us to do so.

In some circumstances, where permitted or required by law, we may process your personal data without your knowledge or consent. This will only be done within the bounds of the Data Protection Legislation and your legal rights.

7. **How Long Will You Keep My Personal Data?**

We will not keep your personal data for any longer than is necessary in light of the reason(s) for which it was first collected:

Type of Data	How Long We Keep It
Identity Information including name.	For as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.
Contact information including address, email address and telephone numbers.	
Payment information including card details and bank account numbers.	
Marketing and communication information including preferences on receiving information from us.	In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

8. **How and Where Do You Store or Transfer My Personal Data?**

We will only store or transfer your personal data within the European Economic Area (the "EEA"). The EEA consists of all EU member states, plus Norway, Iceland, and Liechtenstein. This means that your personal data will be fully protected under the Data Protection Legislation, GDPR, and/or to equivalent standards by law.

9. **Do You Share My Personal Data?**

We will not share any of your personal data with any third parties for any purposes, subject to the following exceptions:

If we sell, transfer, or merge parts of our business or assets, your personal data may be transferred to a third party. Any new owner of our business may continue to use your personal data in the same ways that we have used it, as specified in this Privacy Policy;

In some limited circumstances, we may be legally required to share certain personal data, which might include yours, if we are involved in legal proceedings or complying with legal obligations, a court order, or the instructions of a government authority;

Providers acting as processors based within Europe who provide accounting or email marketing services as cloud service providers;

Professional advisers acting as processors including lawyers, bankers, auditors and insurers based in the United Kingdom who provide consultancy, banking, legal, insurance and accounting services; and

HM Revenue & Customs, regulators and other authorities acting as processors or joint controllers based in the United Kingdom who require reporting of processing activities in certain circumstances.

If any of your personal data is shared with a third party, as described above, we will take steps to ensure that your personal data is handled safely, securely, and in accordance with your rights, our obligations, and the third party's obligations under the law.

10. **How Can I Access My Personal Data?**

If you want to know what personal data we have about you, you can ask us for details of that personal data and for a copy of it (where any such personal data is held). This is known as a "subject access request".

All subject access requests should be made in writing and sent to the email or postal addresses shown in Part 12.

There is not normally any charge for a subject access request. If your request is 'manifestly unfounded or excessive' (for example, if you make repetitive requests) a fee may be charged to cover our administrative costs in responding.

We will respond to your subject access request within one month of receiving it. Normally, we aim to provide a complete response, including a copy of your personal data within that time. In some cases, however, particularly if your request is more complex, more time may be required up to a maximum of three months from the date we receive your request. You will be kept fully informed of our progress.

11. **Cookies**

There is a technology called "cookies" which may be used by us to provide you with, for example, customised information from our website. A cookie is an element of data that a website can send to your browser which may then store it on your system. If you wish, you can adjust your browser so that your computer does not accept cookies. Cookies do not contain confidential information such as your home address, telephone number or credit card details. We do not exchange cookies with any third party websites or external data suppliers.

How to disable cookies in your browser

If you wish to turn cookies off for this website it will also effect all websites that you visit. You can disable cookies from your browser and delete all cookies currently stored on your device.

Details on how to disable cookies for the mainstream browsers can be found below:

1. [Internet Explorer](#)
2. [Chrome](#)
3. [Firefox](#)
4. [Safari](#)
5. [Opera](#)

Please note that if you choose to disable cookies from your browser it may prevent you from taking full advantage of some websites and some may fail to work. You can adjust your cookie settings at any time.

Types of Cookies used on this site:

Cookie Type – Google Analytics

Purpose – These cookies collect information, none of which is personal or traceable back to an individual, that helps us to see how many visitors come to our site and how

they use it. This is so that we can produce reports that will lead to site improvements going forward and allow us to provide better services to our visitors. These types of cookies are non-essential for the functionality of our site. See Google's privacy policy to learn more

Potential Intrusiveness to Customer – Low

12. How Do I Contact You?

To contact us about anything to do with your personal data and data protection, including to make a subject access request, please use the following details:

Email address: enquiries@silverstonegolfclub.co.uk;

Telephone number: 01280 850005;

Postal Address: Silverstone Golf Club, Silverstone Road, Stowe, Buckingham, Bucks, MK18 5LH.

13. Changes to this Privacy Notice

We may change this Privacy Notice from time to time. This may be necessary, for example, if the law changes, or if we change our business in a way that affects personal data protection.

This Privacy Notice was last updated on 25th September 2019.