



EDGA Privacy Policy

Introduction

EDGA is committed to protecting your privacy. This policy explains how we collect, use and store the personal information you provide to us whether online or via phone, mobile, email, letter or other correspondence.

By using our website, any of our services, or providing us with any other personal information we will assume you are agreeing to your information being used and disclosed in the ways described in this policy.

For the purpose of the Data Protection Act 1998 (the Act), the data controller is EDGA

EDGA - Registered Office: Wederikhof 8, 2215 GJ Voorhout, The Netherlands.

EDGA has an internal Data Protection (GDPR) panel that leads on ensuring that the organisation is compliant with the requirements of the GDPR and Information Security.

1. Who are we?

As a European organisation EDGA is uniquely positioned to support the development of initiatives which promote, the development of golf for individuals with impairment across Europe, positively influence public perception and offer meaningful and relevant advice to golf's ruling authorities.

We help individuals with impairment to start, stay, succeed and enjoy golf. We advise and guide organisations on tournaments, training and services to golfers with disability.

EDGA is an international non-profit organisation formed and run by non-governmental, non-profit national sports organisations for golfers with disabilities. EDGA is registered with the Chamber of Commerce, The Hague, The Netherlands: number 27331658.

2. Data Protection

In carrying out our day to day activities we process and store personal information relating to our participants, delivery partners and volunteers, and we are therefore required to adhere to the requirements of the Data Protection Act 1998 and all other applicable data protection laws and regulations, including requirements of General Data Protection Regulation (GDPR).

3. Your rights

You have the right to:

- Request a copy of the information we hold about you;
- Update or amend the information we hold about you if it is wrong;

- Change your communication preferences at any time;
- Ask us to remove your personal information from our records;
- Object to the processing of your information for marketing purposes;
- Raise a concern or complaint about the way in which your information is being used;
- Object to any individual part of the processing of your data.

The GDPR provides the following rights for individuals:

- The right to be informed
- The right of access
- The right to rectification
- The right to erasure
- The right to restrict processing
- The right to data portability
- The right to object
- Rights in relation to automated decision making and profiling.

4. How do we collect information about you?

We collect personal information in the following ways:

a) When you give it to us directly.

You may give us your information in order to sign up for an initiative such as the various tournaments you may enter or one of the information correspondences we issue to our players and members/federation, share your story via our profiles section or attend a training workshop. In doing so you specifically and knowingly provide us with your personal information. Sometimes this information is shared with a third party such as another golf organisation to help promote the activity but we are responsible for your data at all times.

b) When you give it to us indirectly.

Your information may be shared with us by independent bodies or partner organisations. Independent third parties such as these should only do so when you have indicated that you wish to support EDGA. You should check their privacy policy when you provide your information to understand fully how they will process your data.

c) When you give permission to other organisations to share it or it is publicly available.

We may combine information you provide to us with information available from external sources including social media, directories and published articles in order to gain a better understanding of our players, events and services.

5. What personal information do we collect?

Personal information is that which can be used to identify you. It could include your name, date of birth, email address, postal address, telephone number(s), gender, ethnicity, bank details. We do not usually collect sensitive personal information about you unless there is a clear reason for doing so, such as participation in an event, where we need this information to ensure that we provide appropriate facilities to you, or anonymously evaluating programme demographics.

We will mainly use your data to:

- Provide you with the services or information you asked for
- Keep a record of your relationship with us
- Ensure we know how you prefer to be contacted and act upon those preferences
- Understand how we can improve our services or information.

6. Sharing your story

Some people choose to tell us about their experiences of how golf has benefitted them and we collate these stories within our 'Player Profiles' section. This may include them sharing sensitive information related to their family life in addition to their biographical and contact information. If we have the explicit and informed consent of the individuals, or their parent or guardian if they are under 16, the information provided, including gender and ethnicity may be made public by us at events, in materials promoting and growing awareness of our organisation or in documents such as our annual report.

7. Information sharing & Disclosure

We promise never to sell or swap your personal information with any commercial third party.

We may share your personal information with relevant data processors, with whom we have a necessary relationship in order to fulfil the aims of the organisation. These are trusted partner organisations that work with us in connection with our activities. All our trusted partners are equally required to comply with data protection laws and our high standards and are only allowed to process your information in strict compliance with our instructions.

We may disclose your personal information to third parties if we are required to do so through a legal obligation (for example the police). We will never give your information to other organisations for marketing purposes. Your details will only be used by EDGA.

8. Accuracy & Storage of Personal Information

We aim to ensure that all information we hold about you is accurate and, where necessary, kept up to date. If any of the information we hold about you is inaccurate and either you advise us or we become otherwise aware (for instance through word of mouth or publicly available sources), we will ensure it is amended and updated as soon as possible. We really appreciate it if you let us know if your contact details change.

We will keep your information for as long as required, unless you request that we do not do so. We will not keep your information for longer than is reasonable and necessary, taking into account our legal obligations and tax and accounting rules when determining how long we should retain your information. We recognise the right of all contacts of EDGA to be 'forgotten' in the event of a request.

9. Vulnerable Supporters and Under 16s

We recognise the importance of protecting our vulnerable supporters and follow the respective guidance on this matter.

If you are aged 16 or under, and wish to participate in an event or get involved with EDGA, please make sure that you have your parent/guardian's permission before giving us your personal information.

Where possible, we will always seek direct consent from a parent or guardian before collecting any information about children.

When we collect information about a child or young person, we will make it clear as to the reasons for collecting this information and how it will be used, and aim to manage it in a way which is appropriate for the age of the child.

10. Our website

When you interact with us through our website, depending on how you use it, we may collect some personal information. However, you can use our website anonymously ('read only') and not give us any information at all.

We monitor how people use our website so we can improve it. We do this by using cookies, which you can read more about in this document.

If you visit our website, we may record information about:

- The web pages that you visit
- How much time you spend on the site
- Whether you are new to the site, or a return user
- How you came to our website – for example, through an email link or a search engine
- The type of device and browser you use.

Website Analytics: We use Google Analytics, as well as other services, to understand how people use our website so we can make it more effective. Google Analytics collects anonymous information about what people do on our website, where they've come from, and whether they've completed any tasks on the site, for example, signing up to volunteer or donating. Google Analytics tracks this information using cookies and JavaScript code.

Email Analytics: We measure without cookies the success of some of the emails we send – so we know what content our supporters are most interested in. We receive this information anonymously, and it is not shared.

Security: Although we use appropriate security measures once we have received your personal information, the transmission of information over the internet is never completely secure. We do our best to protect personal information, but we cannot guarantee the security of information transmitted to our website, so any transmission is at the user's own risk.

We cannot be held responsible for the privacy of data collected by websites not owned or managed by EDGA, including those linked through our website.

11. EDGA Cookie Policy

What are cookies?

Cookies are small files, typically of letters and numbers, downloaded on to a device when you access certain websites or emails, including the EDGA website. Cookies allow a website to recognise your device. For more information see:

<http://www.allaboutcookies.org/>

If you do not want cookies to be stored on your PC it is possible to disable this function without affecting your navigation around the site.

Disable Cookies

If you are using Microsoft Internet Explorer and you wish to block EDGA website cookies, you can perform the following:

1. On your browser tools menu, select 'Internet Options'
2. Click on the 'Privacy' tab and then on the 'Sites' button
3. Type into the 'Address of website' field: www.edgagolf.com
4. Click on the 'Block' button
5. Click OK

Other browsers including Firefox, Chrome and Safari have similar cookie management abilities in their preferences settings, please refer to your browser's 'Help' facility.

Find more detailed information on disabling cookies from:

<http://www.allaboutcookies.org/>

Cookie Consent

By using our website, subscribing to our services and/or shopping online you agree that we can place the types of cookies set out above on your device.

12. Policy changes

This policy replaces all previous versions and is correct as of April 2018. We will regularly review and update this privacy and data protection statement and will update, modify, add or remove sections at our discretion. Any changes will be notified through an announcement on our website and your continued provision of personal information, use of our website and any of our services after we have posted the changes to these terms will be taken to mean you are in agreement with those changes.

13. How to Contact Us

<mailto:admin@edgagolf.com>

EDGA GDPR Panel – April 2018