



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.

As of May 2018, the General Data Protection Regulation (GDPR) entered into force thereby replacing the Data Protection Act 1998.

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 an International organisation, EDGA is uniquely positioned to support the development of initiatives which promote the development of golf for individuals with impairment worldwide, 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.

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

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 General Data Protection Regulation (GDPR) and all other data protection laws and regulations that may be applicable.

3. Your rights - you have the right to:

- Request a copy of the information we hold about you;
- Request us to update the information we hold about you.
- Change your personal information by logging into the EDGA online database.
- Change your communication preferences at any time;
- Ask us to remove your personal information from our records. *NB: This will remove your WR4GD players pass and you will no longer be eligible to participate in WR4GD approved golf tournaments.*
- Object to the processing of your information based on our legitimate interests. Raise a concern or complaint about the way in which your information is being used;
- Ask us to restrict the processing of your personal data.

4. How do we collect information about you?

We collect personal information in the following ways:

a. *When you give it to us directly.*

In order to apply for an EDGA players pass, you will be required to upload a current head & shoulders photo for identification purposes. It may also be necessary for you to upload supporting medical documentation to confirm your disability.

In most cases, it will be necessary for you to be assessed by an EDGA approved eligibility assessor and all measurements will be retained for future use on your assessment form which will be accessible by the eligibility assessor and EDGA medical team.

- b. You may also provide additional 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 part of 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.

c. *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 share your data. You should check their privacy policy when you provide your information to understand fully how they will process your data.

d. *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?

For EDGA to interact with you, the minimum personal information required will be your name and email address. Additional information may also include date-of-birth, postal address, telephone number(s), and gender. We do not usually collect sensitive personal information about you unless there is a clear reason for doing so, such as R4GD eligibility and/or 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
- Assuming you are eligible, provide you with proof of WR4GD eligibility
- 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 so that we can share 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. Providing we have the explicit and informed consent of the individuals, or their parent or guardian if they are under 16, then the information provided including gender 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

The following information will be published weekly on the WR4GD rankings: Your name, playing handicap, gender, age, WR4GD ranked position, playing statistics, country playing for and EDGA Sport and Primary Classes. As the WR4GD rankings are now processed by WAGR (World Amateur Golf Rankings), it is necessary for the above information to be accessed by WAGR.

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

It is the responsibility of the player or user to maintain their own data via their user record. Additionally, 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 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. We recognise the right of all contacts of EDGA to be 'forgotten' in the event of a request, but we will retain the following data which also applies to users that have diseased: EDGA Pass number, name, date of removal and reason for removal.

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 minor, 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 ask for some personal information. However, you can use our website anonymously ('read only') and not give us any information at all. The content of our website is subject to change without notice and is for your general information and use only. Any external website links are provided for the convenience of our visitors and do not signify that EDGA endorses them or has any responsibility for their content.

We also monitor how people use our website so that we can improve it and make it more effective. To understand how people use our website we use industry standard analytic tools such as Google Analytics which collects anonymous information about what people do on our website and where they've come from. Google Analytics tracks this information using cookies and JavaScript code.

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.

11. 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.

12. 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.

13. EDGA Cookie Policy

Cookies are small files consisting of letters and numbers which are downloaded to your device when accessing most websites including the EDGA websites.

Cookie Consent

By using the EDGA website or any other online service that is administered by EDGA, we hereby certify that apart from the use of analytics as described in section-10, we will only store cookies on your device if it improves your ability to navigate around the site and having first requested your permission to do so. If you choose not to have cookies stored on your device, then it will not restrict your ability to navigate around the site or access our services.

For more information on cookies see: www.allaboutcookies.org

14. 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.

15. How to Contact Us

email to: admin@edgagolf.com