**Privacy Policy: contractors, suppliers and staff**

Coolhurst club has duties to respect data and this means that we are responsible for how and why personal information is used. Our data protection officer can be contacted at admin@coolhurst.co.uk.

We are committed to respecting privacy and to complying with the Data Protection Act and any other relevant privacy laws. Our commitment to data protection principles is set out in our Data Protection Policy. This privacy policy sets out how Coolhurst collects, uses and protects personal information.

**Collection and Use of Personal Information: contractors and suppliers**

In the course of transacting business with contractors and suppliers, the club will hold personal information about individuals such as their name, business and email address, and telephone numbers. We will do our best to maintain this data accurately.

**Collection and Use of Personal Information: staff**

As an employer of staff the club needs to hold and to process personal information about employees that will include their contact details as well as information relating to their pay and their employment record.

**Need to process data**

The club will hold and process this data as it is necessary for the purpose of its legitimate interests in operating as a business, and will do so except where such interests are overridden by the interests, rights or freedoms of a particular individual.

**Authorisation of use by club officials, managers and staff on behalf of the club**

Access to and use of the information for these purposes is restricted to individuals authorised by the GMC.

**Retention and Deletion**

When contractors, suppliers or staff provide the club with personal information it is only retained for as long as it is needed. All personal membership information held by the club no longer required is deleted in a structured, secure and timely manner.

**Disclosure of Personal Information**

The club will only disclose personal information to lawful authorities for the purpose of investigating crime or civil wrongs.

**CCTV**

The club has installed and manages a number of CCTV cameras. It did so having assessed that the installation of cameras was the best solution to the problem of identifying and investigating incidents of potential criminal activity, disorderly conduct, lost or damaged property, or behaviour that would bring the club into disrepute. The club has registered its use of CCTV with the Information Commissioner’s Office. The person responsible for operating the system is the clubhouse manager who has sufficient training to understand how to operate the system and the cameras. She is the person to contact if anyone wishes to request copies of their images.

The cameras are sited both inside and outside the clubhouse, but are positioned to provide clear images and avoid so far as possible capturing external images of people not visiting the club. The club does not provide images to third parties other than law enforcement bodies.

The club only retains images for long enough to allow for any incident to come to light (eg for a theft to be noticed) and to investigate it. It selected a system that produces high quality, clear images which law enforcement bodies (usually the police) can use to investigate crime. The club can easily extract these images from the system when required. The club carries out regular checks to ensure that the system is producing high quality images.

CCTV images are stored securely and access is limited to authorised individuals. There is a sign on the clubhouse door indicating that CCTV is in operation.

**Right to Access Information**

The Data Protection Act provides people with a right of access to a copy of any personal information the club may hold about them. A person with parental responsibility for a child may access information held about their child. This is called the right of subject access.

The club reserves the right to verify the identity of the person making the request, using all reasonable means, and will do so particularly where the information requested is about a child. The club is required to provide applicants with a copy of relevant personal information within a month. If the information held is shown to be incorrect the club will make the necessary amendments.

The club reserves the right to charge a reasonable fee when a request is manifestly unfounded or excessive, particularly if it is repetitive.

**Right to object or request for erasure, restriction**

If a person wishes his or her personal data to be erased or restricted, or to object to their data being used on grounds relating to their particular situation, the club will comply with the request, but the person should be aware of the inevitable limitation on the club’s ability to communicate with them. The club may decline comply with an objection or a request to erase or restrict data to comply with a legal obligation or for the performance of a public interest task or exercise of official authority; for public health purposes in the public interest; or for the exercise or defence of legal claims.

**The Information Commissioner’s Office (ICO)**

The ICO is the public authority to which complaints or appeals can be made about data protection matters. For further information on the Data Protection Act and on the rights contained in the EU General Data Protection Regulations and how they are given effect in UK law, please visit the following website: www.informationcommissioner.gov.uk