



Nene Golf – GDPR Privacy Policy & Data Processing Statement

Effective Date: February 2025

1. Data Controller Details

Data Controller: Nene Golf

Address: Thorpe Wood Driving Range, Peterborough

Telephone: 01733 267701

Nene Golf acts as the Data Controller for all personal data processed in connection with golf bookings, membership administration, competitions, marketing communications, and customer service.

All personal data is processed in accordance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

2. Scope of this Policy

This policy applies to all personal data processed by Nene Golf relating to:

- Members
- Visitors
- Society and event bookings
- Competition participants
- Customers interacting via BRS Golf, GolfNow, and Nene Golf systems

This includes both electronic and manual records.

3. Categories of Personal Data Collected

Nene Golf may collect and process the following categories of personal data:

3.1 Identity Data

- Full name

- Date of birth

3.2 Contact Data

- Email address
- Telephone numbers
- Postal address

3.3 Membership & Booking Data

- Membership category and status
- Booking history
- Tee time preferences
- Competition entries
- Event participation

3.4 Financial Data

- Payment transactions (*card details are processed and stored securely by approved third-party payment processors. Nene Golf does not store full card details.*)

3.5 Technical & Usage Data

- Booking behaviour
- Website interaction
- Marketing engagement data
- Analytics and reporting outputs

4. Lawful Basis for Processing

Nene Golf processes personal data under the following lawful bases:

4.1 Contractual Necessity

Processing required to fulfil bookings, manage memberships, administer competitions, and deliver services.

4.2 Legal Obligation

Processing required to comply with statutory, financial, and sporting governance requirements.



4.3 Legitimate Interests

Processing required to operate, manage, improve, and market club services, including reporting, pricing optimisation, customer engagement, and service development.

A Legitimate Interests Assessment (LIA) has been conducted to ensure that individual rights do not override these interests.

4.4 Consent

Used for direct digital marketing communications, including promotional emails.
Consent may be withdrawn at any time.

5. Purposes of Processing

Personal data is processed for the following purposes:

- Membership administration
- Tee time bookings and confirmations
- Competition management and handicap reporting
- Payment processing
- Customer communication
- Marketing communications (where consent is provided)
- Dynamic pricing analysis and optimisation
- Reporting and business analytics
- Social media marketing campaigns
- Customer service and complaint handling
- Regulatory compliance

6. Data Processors & Third-Party Sharing

Nene Golf shares personal data only with trusted, contractually bound processors for legitimate operational purposes.

6.1 BRS Golf (operated by GolfNow) – Booking System Provider

BRS Golf provides the booking, membership, and competition management platform.

- BRS Privacy Policy: <https://www.brsgolf.com/privacy-policy>
- GolfNow Privacy Policy: <https://www.golfnow.co.uk/privacy-policy>

BRS Golf acts as a Data Processor, processing data under contractual instruction and GDPR-compliant terms.

6.2 The Revenue Club – Revenue & Marketing Services

The Revenue Club provides:

- Dynamic pricing management
- Digital marketing email campaigns
- Social media marketing
- Reporting and performance analytics

Data shared includes relevant booking, usage, and contact data strictly necessary to perform these services.

The Revenue Club operates as a Data Processor under formal data processing agreements and GDPR-compliant contractual terms.

6.3 Payment Processing Providers

Secure payment providers process card payments on behalf of Nene Golf.

Nene Golf does not store full payment card details.

6.4 Governing Bodies

Personal data may be shared with recognised governing bodies (e.g., England Golf) for:

- Handicap management
- Competition administration
- Regulatory compliance

6.5 Internal Access

Access is strictly limited to authorised staff and professional contractors who require access to perform their operational duties.



7. International Transfers

Nene Golf does not routinely transfer personal data outside the UK.

Where third-party providers store or process data outside the UK, appropriate safeguards are in place, including:

- UK GDPR adequacy decisions
- Standard Contractual Clauses (SCCs)
- Data Processing Agreements

8. Data Security Measures

Nene Golf implements appropriate technical and organisational measures to protect personal data, including:

Secure cloud-based booking platforms

- Access control and role-based permissions
- Password protection and authentication systems
- Encrypted payment processing
- Staff training in data protection awareness
- Secure storage of manual records
- Regular system updates and security monitoring

9. Data Retention

Personal data is retained only for as long as necessary to meet operational, legal, and regulatory requirements.

Typical retention periods include:

- Membership records: Duration of membership + 6 years
- Booking records: 24 months
- Financial records: 6 years (HMRC compliance)
- Marketing data: Until consent withdrawn or inactive for 24 months

Data is securely deleted or anonymised once retention periods expire.

10. Individual Rights

Under UK GDPR, individuals have the following rights:

- Right of access
- Right to rectification
- Right to erasure
- Right to restrict processing
- Right to data portability
- Right to object
- Rights related to automated decision-making and profiling

Requests will be responded to within one calendar month.

11. Data Breach Management

Nene Golf operates internal procedures for detecting, reporting, and investigating data breaches.

Where required, breaches will be reported to:

- The Information Commissioner's Office (ICO) within 72 hours
- Affected individuals where there is high risk to rights and freedoms

12. Complaints

Individuals have the right to lodge a complaint with:

Information Commissioner's Office (ICO)

Website: <https://www.ico.org.uk>

13. Policy Review

This policy is reviewed annually or sooner if regulatory, operational, or system changes occur.