



**ENGLAND
GOLF**

WHS Privacy Notice response

24 September 2020

To: All affiliated golf clubs

In light of the statement issued today by the NGCAA to some golf clubs regarding member data in relation to the forthcoming World Handicap System (WHS), I am writing to all affiliated golf clubs to reiterate England Golf's position.

The move to the WHS in November 2020 means that in England we are moving from a system with some 1,800 calculation hubs to a central England Golf platform. England Golf is committed to upholding the integrity of the game for all and has worked hard to create a WHS platform that will ensure the integrity of the handicap system not just for now, but for the future. The handicap system must produce a handicap that is a fair reflection of a golfer's ability and we see this as part of our duty to our individual members who pay affiliation fees to England Golf via affiliated clubs and member counties.

As per our communication to you on 16 September 2020, we have set out the information required from members in our [WHS privacy notice](#), which includes date of birth and email address as required fields. The information will be collected from golf clubs via ISVs.

Clubs will need to take steps to ensure that all members are informed of the privacy notice as part of your ongoing communications around WHS by 5 October 2020. We appreciate that clubs will have their own ways of communicating with members, but you may wish to publish the notice on your website, include a link in your club newsletter or email members directly with the notice.

Going forward, from 5 October 2020 the England Golf WHS privacy notice will need to be included in the documents provided to new members to ensure that they will be properly informed about how England Golf will handle their data with respect to handicapping. From that date, any changes to member data will need to be made via the England Golf platform as set out in our email of 8 September 2020. There is no need for members to opt-in to the transfer of personal data to England Golf and both members' email address and date of birth will be required in order for us to issue a handicap. We will only use members' data collected in this way for the purposes of handicapping or other fundamental benefits of being a member of England Golf. Full details are set out in the privacy notice itself.

As in-house lawyer and data protection officer for England Golf, I take the obligations and

responsibilities of the organisation very seriously. They are my obligations and responsibilities. England Golf has considered very carefully what information is required from members and have been guided by the principles in the General Data Protection Regulation (GDPR). This states that the information collected from members should be adequate, relevant and accurate, as well as necessary, and I am satisfied that we are asking for the right information to uphold the integrity of the handicapping system in England for the benefit of all members.

I would ask you to read the privacy notice which sets out clearly what information we are asking for, the reasons why and how it will be used. If, having read the notice, you have any further questions please do feel free to contact the team and myself via WHS2020@englandgolf.org

Many thanks for your support on this matter as we move ever closer to launching the WHS in November.

Yours sincerely

Emily Green
Head of Legal