

FIVE NATIONS

DURBUY GOLF CLUB

Data protection and privacy notice

1- Introduction

The processing of personal data is submitted to compliance with the law, currently the Belgian law and the European regulation n°2016/679 of 27 April 2016 on data protection, known as "GDPR" or any other legislative act modifying them.

Data protection and privacy is of very important for Golf de Durbuy PLLC. We are committed to protect and process your personal data in accordance with the law and in a fair and transparent manner.

The purpose of this statement is to explain to you how Golf de Durbuy collects, uses and retains personal data relating its customers and to any person in contact with Le Sanglier des Ardennes.



By "data", Golf de Durbuy aims to all personal data concerning the customer, namely any information relating to a person that allows to identify him/her directly or indirectly.

2- Processing manager

The processing manager is Golf de Durbuy, its registered office is in Route d'Oppagne, 34 - 6940 Durbuy. It is Golf de Durbuy that determines the purposes for which your data is processed, the means implemented and all the characteristics of the treatment.



"Data processing" means any operation on your personal data, whether it is collection, registration, organization, storage, adaptation or modification, retrieval, consultation, use, communication by broadcast or any other form of provision, reconciliation or interconnection and archiving, erasure or destruction.

If you have any questions, you can contact our Data Protection Officer ("DPO") by writing to the following address: Route d'Oppagne, 34 - 6940 Durbuy or by sending an e-mail to dpo@lpm.be.

3- Categories of data processed and sources

Golf de Durbuy may be required to process information, data and information of any kind, to the extent that the processing of such information is necessary or useful for the performance of the activities of Golf de Durbuy.

Data categories	Information's	Data sources
Identification data	Ex.: Surname, first name and date of birth.	Delivery or sending of a printed, completed form or document, or a request, whatever the medium; or in any other way (for example: during a visit by a sales representative, by mail, telephone, e-mail, etc.).
Contact data	Ex.: Telephone number, postal address and e-mail address.	Delivery or sending of a printed, completed form or document, or a request, whatever the medium; or in any other way (for example: during a visit by a sales representative, by mail, telephone, e-mail, etc.).
Bank data	Ex.: Bank account number, credit card number	Delivery or sending of a printed, completed form or document, or a request, whatever the medium; or in any other way (for example, by mail, telephone, e-mail, etc.).
Taking pictures	Ex.: Pictures and videos.	Data from video surveillance systems. Our surveillance cameras located in and around our adventure park.
Health data	Ex.: In case of a specific diet (allergies, vegetarian diet, etc).	Delivery or sending of a printed, completed form or document, or a request, whatever the medium; or in any other way (for example, by mail, telephone, e-mail, etc.).
Habits	Ex. : Preferences	This information is given by you, if you feel it necessary that we keep it in your customer profile.

4- Processing, purposes and legal bases

We process the data described above for specific, explicit and legitimate purposes. Only data which are necessary and relevant for a given purpose will be processed. We do not collect or process your data for purposes other than those described below.

Processing	Purposes	Legal bases
Customer relationship management	Respond to your requests for information, questions, complaints, suggestions, etc. Contact you again following the lost/forgotten/ theft of an object/ damage to equipment.	Your consent following a request from you or our legitimate interest in contacting you following an omission, loss or theft.
Reservation management	To be able to confirm your reservations, perform the services you have booked, refund you, send you an invoice, if necessary,	The contractual necessity. Indeed, without the processing of your personal data in this context, it is impossible for us to offer you our services.

	ensure repair in case of damage to equipment.	
Federal management	To be able to register or unsubscribe members of the club, organize competitions and registrations, ...	The legal obligation to register its members with the Royal Belgian Golf Federation and your consent to register for competitions.
Customer profile management	Offer a high-end and personalized service to our customers.	Our legitimate interest when you provide us with information about you that is not necessary for the management of your booking (eg preferences).
Security management	Ensure compliance with our safety obligations and offer you a safe and secure recreational area.	Our legitimate interest in protecting you and securing our site.
Direct marketing	Keep you informed of our offers, our new infrastructures, etc	Your consent by subscribing to our newsletter via our website.

5- Recipients of your data

In order to process your data as efficiently as possible, we must transmit it to certain internal departments:

Internal recipients:	The accounting department
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For some services, we may use specialized companies to process your data on our behalf and according to our instructions ("subcontractors"). Only the strictly necessary data will be processed by these companies and this, in the respect of your privacy.

External recipients:	<p>Mews: Reservation management software for the activities.</p> <p>Exact Online: Accounting software.</p> <p>Google Suite (Gmail, Groups, Drive): Applications to manage our daily activities.</p> <p>Campaign Monitor: Email marketing software.</p> <p>Expedia: Online booking software.</p> <p>Booking: Online booking software.</p> <p>Resengo: Online booking software.</p> <p>Chronogolf: Golf course management software.</p> <p>i-Golf: Golf federation software.</p> <p>Transfers of your data to countries outside the European Economic Area may take place.</p>
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	<ul style="list-style-type: none">• In the case of the United States, they are subject to the EU-US Privacy Shield.• In order to ensure an adequate level of security, transfers to other third countries will be subject to another protection mechanism, for example, the Commission's Standard Contractual Clauses. <p>If you would like more information on the applicable transfer mechanism, please send an email to the following address: dpo@lpm.be.</p>
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6- Duration of data conservation

Golf de Durbuy makes sure not to store your personal data beyond the time required for the processing for which it was collected and for a maximum of 10 years to meet legal and tax obligations.

At the end of this period, your data are deleted or anonymized.

7- Your rights

- You have the right to be informed and to access your personal data,
- You have the right to request the rectification or completion of your personal data,
- You have the right to request the deletion (*) of your personal data,
- You have the right to request a limitation (*) on the processing of your personal data,
- You have the right to request the portability (*) of your personal data,
- You have the right to object (*) to the processing of your personal data.

You may exercise your rights by a written, dated, signed and co-signed application to our Data Protection Officer ("DPO") by writing to the following address: Route d'Oppagne, 34 - 6940 Durbuy or by sending an e-mail to dpo@lpm.be.

(*) The exercise of these rights is subject to prior analysis by our DPO.

NB: Please note that in some cases, you may be asked for a copy of your identity document before your request is processed.

8- Security of your personal data

Personal data is only outsourced to companies which guarantee a sufficient level of data protection.

Golf de Durbuy protects the personal data collected under its control by technical and organizational protection measures such as encryption, anti-virus, firewalls, access controls.

Access to your personal data is in any case only accessible to authorized persons, for whom this access is necessary for the accomplishment of their mission. These persons are held at a professional discretion and must respect all the technical prescriptions provided to ensure the confidentiality of personal data.

9- Submit a complaint

In the event of any dispute regarding the processing of your personal data, you may address a complaint to our Data Protection Officer ("DPO") by writing to the following address: Route d'Oppagne, 34 - 6940 Durbuy or by sending an e-mail to dpo@lpm.be.

You can also submit a complaint to the Commission for the Protection of Privacy by post at Rue de la Presse, 35, 1000 Brussels, by e-mail at commission@privacycommission.be or by phone at 02 / 274.48. 00.