



**SODBURY
SWINGERS**

— EST. 2026 —



SODBURY SWINGERS GOLF SOCIETY

PRIVACY, COOKIES & COMMUNICATIONS POLICY

VERSION 1.0 | EFFECTIVE 7 SEPTEMBER 2026

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Item	Policy Detail
Document	Privacy, Cookies & Communications Notice
Owner	Sodbury Swingers Golf Society Committee
Version	1.0
Effective date	7 September 2026
Applies to	Members, Guests, website users and other individuals whose personal information is processed by Sodbury Swingers Golf Society
Review	At least annually, or sooner following a material change

KEY PRINCIPLE: The Society collects only personal information reasonably required for legitimate Society purposes and aims to handle it fairly, securely and proportionately.

1. Purpose and Scope

Sodbury Swingers Golf Society collects and uses limited personal information in order to administer the Society, its membership, Guests, events, competitions, handicaps, payments, communications and online services.

This Notice explains what information the Society may collect, why it is used, how it may be shared and retained, and the choices available to Members, Guests, website users and other people who interact with the Society.

This Notice applies to personal information processed through Society activities including the Society website and Member Area, Squabbit, Society administration records and trackers, event registrations, payment records, communications, photographs and other Society services.

Sodbury Swingers Golf Society is responsible for determining how personal information used for Society administration is handled. External providers may also process information under their own privacy terms.

2. Information We May Collect

Depending on how a person interacts with the Society, information may include:

- name and contact details, including email address and telephone number;

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- membership information, including membership status, membership period and benefits;
- Guest and event registration information, including attendance, bookings, withdrawals, substitutions and event preferences;
- golf information, including Handicap Index, Society Handicap records, scores, results, competition history, tee information and other competition data;
- financial administration information, including amounts due, amounts paid, refunds, credits, outstanding balances and payment references;
- Society records, including prizes, Order of Merit standings, disciplinary decisions, appeals and other records required to administer the Society;
- communications and preferences, including notification preferences and relevant correspondence;
- website and Member Area information, including account information and login-related records;
- cookie, storage and device information, including consent choices and technical information generated through the website or embedded services;
- photographs, video or other media taken at Society events or supplied to the Society;
- sponsorship or supplier contact information; and
- other information voluntarily provided where reasonably relevant to Society administration or participation.

The Society does not intentionally collect more personal information than is reasonably required.

3. How and Why We Use Personal Information

3.1 Membership and event administration

To manage membership applications and renewals, Guest participation, event bookings, attendance, withdrawals, payments, refunds and membership benefits.

3.2 Competition and handicap administration

To calculate and administer handicaps, organise competitions, record scores and results, manage prizes, maintain standings and Order of Merit records, investigate scoring or handicap issues and preserve competition integrity.

3.3 Society administration and governance

To maintain appropriate financial, membership, competition and governance records; manage complaints, appeals and disciplinary matters; communicate Committee decisions; and operate the Society effectively.

3.4 Communications

To provide information reasonably connected with Society membership or participation, including events, tee times, payment reminders, results, rule changes, Society news and other administrative updates.

3.5 Website and Member Area

To provide website functionality, manage access, display Society information and maintain security and operation of the website.

3.6 Photography, publicity and Society promotion

To document Society events, publish appropriate photographs or results and promote the Society, subject to the safeguards in this Notice.

3.7 Sponsorship and supplier administration

To communicate with venues, sponsors, suppliers and other organisations involved in Society activities.

3.8 Lawful Bases

Depending on the circumstances, the Society may rely on one or more of the following lawful bases:

- **Contract or steps connected with a contract** - where processing is necessary to provide membership, a booking, event place, purchase or other service requested by the individual.
- **Legitimate interests** - where processing is reasonably necessary for Society administration, operation, financial management, communication, competition integrity or development and those interests are not overridden by the individual's rights.
- **Legal obligation** - where information must be used or retained to comply with an applicable legal requirement.
- **Consent** - where the Society asks an individual to make a genuine optional choice, for example for certain website technologies, optional communications or particular media uses.

Where consent is relied upon, it may be withdrawn at any time. Withdrawal does not affect processing that was lawful before consent was withdrawn.

The Society will not rely on consent where another lawful basis more appropriately reflects necessary membership, event, financial, handicap or competition administration.

4. Cookies, Storage Technologies and Embedded Services

The Society website may use cookies, local storage or similar technologies to provide website functionality, remember user choices and support optional features.

4.1 Essential Website Storage

Some storage may be necessary for the website or Member Area to function correctly, maintain security, remember essential settings or provide a service specifically requested by the user. Where the law permits, these technologies may operate without optional consent.

4.2 Optional Website Storage

Optional cookies, local storage or similar technologies will not be enabled until the user has made the relevant choice where consent is required.

Declining optional storage will not prevent access to the main public areas of the Society website, although some optional features may be unavailable or work differently.

4.3 Squabbit Leaderboards and Embedded Content

The Society website may display information or embedded content provided by third-party services, including Squabbit leaderboards, competition information or results.

Where displaying that content requires an optional connection to a third-party service, the feature will not load unless the visitor has accepted the relevant optional website storage or connection.

In particular, Society leaderboards or other embedded Squabbit content may not be displayed where optional cookies or storage have been declined.

If enabled, the user's browser or device may connect directly to the relevant third-party provider. That provider may receive technical information such as the user's IP address, browser or device information under its own privacy practices.

4.4 Remembering Consent Choices

The website may remember a visitor's privacy or cookie choice for a reasonable period so that the same question does not need to be asked on every visit.

Visitors will be provided with a way to revisit or change optional cookie or storage preferences where reasonably practicable.

4.5 Third-Party Services

Third-party websites and services are responsible for their own use of personal information and storage technologies. Sodbury Swingers does not control how an external provider processes information once a user chooses to interact directly with that service.

5. Communications and Notifications

Sodbury Swingers may communicate with Members, Guests and event participants where reasonably necessary to administer the Society or an activity they have chosen to take part in.

Administrative communications may include:

- membership and renewals;

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- event bookings, payments and outstanding balances;
- tee times, groups and event arrangements;
- competition formats, rules and handicap information;
- changes, cancellations or important safety information;
- results, prizes and competition administration; and
- Committee decisions or other matters directly relevant to the individual's participation.

These administrative communications are separate from optional push-notification subscriptions and do not depend on a person enabling browser or device notifications.

5.1 Push Notifications

The Society may offer optional push notifications through the Society website or Member Area. Users may choose whether to enable them.

Push notifications may include:

- new Society news articles;
- new or updated events;
- new competition results;
- general Society announcements; and
- custom notifications sent by authorised Committee members.

Permission to receive push notifications will be requested separately and will not be assumed merely because somebody becomes a Member, creates an account or attends an event.

Where notification permission is offered during membership registration, the Member must still make their own choice whether to enable it. Declining notifications will not affect membership or eligibility to participate in Society events.

Users may disable push notifications through the Society website, Member Area, browser or device settings where supported.

5.2 Communication Preferences

Where practical, the Society may provide preferences allowing users to control the types of optional notifications they receive.

Opting out of optional notifications does not prevent the Society from contacting an individual directly where communication is reasonably necessary for an existing membership, booking, payment, competition, disciplinary matter or other administrative purpose.

6. Photographs, Video and Other Media

Photographs, video and other media may be taken during Sodbury Swingers events, trips and Society activities for purposes including event coverage, Society news, results, historical records, website content, social media and promotion of the Society.

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General event photography does not normally require individual written consent where the use is reasonable, proportionate and consistent with the nature of the event. The Society will respect reasonable requests from individuals who do not wish to appear in published photographs or who ask for a particular image to be removed where reasonably practicable.

Members and Guests should contact the Committee if they have concerns about the publication of a photograph or other media in which they appear.

6.1 Individual Profiles and Featured Images

Where the Society intends to use an identifiable photograph as an individual profile image, Committee biography, sponsor feature or other prominent individual presentation, the Society will normally obtain the individual's agreement before publication.

6.2 Supplied Media

A person who provides photographs, video or other media to the Society should only provide material they are entitled to share and should avoid supplying material where they know another person has reasonably objected to publication.

6.3 Removal Requests

Where a reasonable request is made to remove identifiable media, the Society will consider it promptly. Removal from Society-controlled channels may not remove copies already downloaded, shared or independently published by other people or third-party services.

7. Sharing Personal Information

Sodbury Swingers does not sell personal information to third parties.

Personal information may be shared where reasonably necessary for Society administration, event delivery, competition management or another legitimate Society purpose, including with:

- authorised Committee members who require the information for their Society role;
- golf clubs, event venues and accommodation or travel providers where information is required to administer a booking or Society trip;
- Squabbit or other competition-management services;
- website, hosting, notification, email or other technology providers supporting Society services;
- payment providers or financial institutions involved in processing or reconciling payments;
- suppliers providing Society merchandise, prizes or Member benefits where information is genuinely required;
- professional advisers, insurers or appropriate organisations where reasonably required; and
- law-enforcement bodies, regulators or authorities where disclosure is required or permitted by law.

The Society will seek to share only the minimum information reasonably necessary.

7.1 Public Competition Information

Certain information connected with Society participation is intended to be visible to other players or the public. This may include a player's name, handicap, competition scores, results, prize information, team allocation, Order of Merit position and other standings.

By participating in a Society competition, Members and Guests should reasonably expect this type of competition information to be published through Society channels such as the website, Member Area, Squabbit or event communications.

Personal contact details, payment information and private Committee records will not normally be included in public competition information.

7.2 Sponsors

A sponsor does not receive access to the Society membership database or Members' personal contact information merely because it sponsors the Society.

Information will only be shared with a sponsor where there is a separate legitimate reason and the requirements of this Notice and applicable data-protection law have been satisfied.

8. How Long We Keep Information

Sodbury Swingers will retain personal information only for as long as it is reasonably required for the purpose for which it is held, including Society administration, competition integrity, financial record-keeping, dispute resolution and legitimate historical records.

Different categories of information may therefore be retained for different periods.

8.1 Membership and Contact Information

Current Member information will normally be retained for the duration of membership and for a reasonable period afterwards where required for administration, renewal history, financial records or resolution of outstanding matters.

Contact information that is no longer required will be deleted, anonymised or archived where reasonably practicable.

8.2 Competition and Handicap Records

Scores, handicaps, results, prize records, Order of Merit standings and other competition history may be retained for longer periods as part of the Society's sporting and historical record.

A person ceasing to be a Member or Guest does not automatically require legitimate historic competition results to be removed.

Where practical, older records may be archived or reduced to the information reasonably necessary to preserve the competition record.

8.3 Financial Records

Payment, refund, event-accounting and other financial records will be retained as long as reasonably required for accounting, reconciliation, dispute resolution and applicable legal or tax requirements.

The Society will not retain unnecessary payment credentials or banking information merely because a transaction has taken place.

8.4 Disciplinary, Complaint and Appeal Records

Records relating to disciplinary matters, complaints, appeals or handicap-integrity reviews will be retained only for as long as reasonably necessary, taking account of the seriousness of the matter, the possibility of recurrence and the need to demonstrate how a decision was reached.

Access to these records will be restricted to people with a legitimate need to know.

8.5 Website Accounts and Notifications

Website account information and notification preferences may be retained while the account or service remains active and for a reasonable period afterwards where required for administration, security or record-keeping.

Where a person asks for an account to be closed, information that is no longer required will be removed or anonymised where reasonably practicable, subject to any information the Society needs to retain independently for another legitimate purpose.

8.6 Photographs and Historical Material

Photographs, news articles, event reports and other legitimate Society archive material may be retained as part of the Society's historical record. Reasonable requests concerning identifiable photographs will be considered in accordance with Section 6.

9. Your Data Protection Rights

Depending on the circumstances and lawful basis, individuals may have rights in relation to personal information held by the Society, including the right to:

- ask what personal information the Society holds about them and request a copy;
- ask for inaccurate or incomplete information to be corrected;
- ask for personal information to be deleted where the right to erasure applies;
- ask for the use of personal information to be restricted in certain circumstances;
- object to particular uses of personal information where the right applies;
- withdraw consent at any time where consent is the lawful basis; and
- request transfer of certain information in a portable format where the legal requirements apply.

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These rights are not all absolute. The Society may need to retain legitimate financial, competition, handicap, disciplinary or historical records even where an individual asks for other information to be deleted.

Requests may be made through the contact details published on the Society website. The Society may ask for reasonable information to confirm identity before disclosing or changing personal information.

The Society will respond to valid data-protection requests within the applicable legal timeframe and will explain where a request cannot be fulfilled in full.

9.1 Complaints

Anyone with concerns about how the Society has handled personal information should contact the Society in the first instance so the matter can be reviewed.

Individuals also have the right to raise a concern with the Information Commissioner's Office where applicable.

10. Security and Sensitive Information

The Society will take reasonable and proportionate steps to protect personal information against unauthorised access, accidental loss, inappropriate disclosure, alteration or misuse.

Safeguards may include:

- restricting administrative access to authorised Committee members;
- using password-protected accounts and services;
- limiting access to financial, disciplinary, handicap-review and membership records according to role and need;
- protecting calculated or administrative records from unnecessary editing where practicable;
- avoiding unnecessary duplication of personal information across systems; and
- reviewing or removing access when a Committee member or authorised person no longer requires it.

No electronic or physical system can be guaranteed completely secure, but the Society will aim to use safeguards proportionate to the nature of the information held.

10.1 Health and Other Sensitive Information

The Society does not routinely require Members or Guests to provide health or other sensitive personal information.

A person may occasionally choose or need to provide limited information relating to health, injury, disability or another sensitive circumstance - for example when requesting event assistance, explaining a withdrawal, arranging a buggy or asking the Committee to consider a change in playing ability.

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The Society will seek to collect and use only the minimum information reasonably necessary, restrict access to people who genuinely need it and avoid unnecessary medical detail in general Society records.

Where data-protection law requires an additional lawful condition for processing sensitive or special-category information, the Society will ensure that an appropriate condition applies. Where appropriate, this may include obtaining explicit consent.

Sensitive information will not normally be published or shared with other Members or Guests unless the individual has clearly agreed, disclosure is necessary for a legitimate and lawful reason, or disclosure is otherwise required by law.

11. International Processing and Third-Party Services

Some third-party services used by Sodbury Swingers may store or process personal information outside the United Kingdom. This may occur where a website, competition-management, communications, notification or other technology provider operates systems internationally.

Where the Society selects or uses a third-party service involving an international transfer, it will take reasonable steps to use providers and arrangements that provide appropriate protection in accordance with applicable data-protection requirements.

Depending on the service and destination, appropriate safeguards may include an applicable UK adequacy arrangement, contractual protections or another legally recognised transfer mechanism.

Third-party providers may also process certain information as independent organisations under their own privacy terms. Members, Guests and website users should review those terms where they choose to interact directly with an external service.

12. Contacting the Society

Questions, requests or concerns relating to personal information, cookies, communications or this Notice should be directed to the Sodbury Swingers Golf Society Committee using the contact details published on the Society website.

Where a matter relates specifically to a particular area of Society administration, it may be referred internally to the appropriate Committee officer, but access to personal information will remain limited to those who reasonably need it.

13. Changes to This Notice

This Notice will be reviewed at least annually and may also be updated where there is a material change to the Society's activities, website functionality, use of third-party services or applicable data-protection requirements.

Material changes will be published through the Society website or another official Society channel. Where a change materially affects an optional consent previously given, the Society will seek a new choice where required.

Policy versions take effect from their stated effective date and replace previous versions from that date.

Reference Documents

Reference	Relevance
Society Rules & Fair Play Policy	Rules, conduct, scoring and confidentiality.
Handicap Management Policy	Handicap and scoring records.
Membership & Guest Policy	Membership data and participation.
Constitution & Governance Policy	Committee responsibilities and access.
Applicable event Terms & Conditions	Event-specific information and acceptance.
Society Rules & Fair Play Policy	Rules, conduct, scoring and confidentiality.



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