

MUTHAIGA GOLF CLUB

Privacy Policy

This Privacy Policy (the '**Privacy Policy**') sets out how Muthaiga Golf Club ("the **Club**" "**us**" or "**we**") collects, uses and discloses personal information we receive from individuals, including but not limited to prospective members, visitors and those who interact with the Club's online platforms and any of its social media channels ('**you**' or '**your**' being interpreted accordingly).

Please take care to ensure that you have read and fully understand the terms of this Privacy Policy.

The Club is the controller and responsible for your personal data (collectively referred to as the "Club", "we", "us" or "our" in this Privacy Policy).

Scope of Application

The Privacy Policy provides information on what personal data we collect, why we collect the personal data, how it is used and the lawful basis on which your personal data is processed, and what your rights are under the Kenya's Data Protection Act, 2019 (the **DPA**).

As used in this Policy, '**Personal Data**' includes information that can be used to identify an individual.

Personal Data we Collect:

General information: We collect personal details you provide in any interactions or activities conducted between you and us. This may include your name, passport details, identity details, photographs, nationality, address, e-mail address; and phone number- and other information that you elect to provide to the Club. We may also collect your financial details for the purposes of any transactions involving you and the Club.

Visitor and prospective members' information: Visitor information to our Club, such as your first and last name, photo, email address, family details, data collected through Closed Circuit Television (**CCTV**), billing and payment information. Personal data collected in relation to visitors and enquiries will be processed in accordance with this Privacy Policy together with such other policies that will be provided at the time of making any membership application so please ensure that you read and understand the Privacy Policy.

Log data: We may also process personal data such as internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, device ID and other technology on the devices you use to access our website at <https://www.muthaigagolfclub.com/> or any of the Club's other online platforms and any electronic system that you use to access our information and services. Where applicable, we may use cookies to distinguish you from others and to provide functionality when you are browsing. For further details about cookies, how they are used and how they can be deleted or disabled, you can visit <https://allaboutcookies.org/> .

Suppliers: we collect personal details such as your name, your address, identification information, your contacts, bank account details, business name, tax identification information, billing information and creditworthiness information kept by third parties. This information is collected for purposes of making business decisions and for implementing the contracts entered into with the Club.

Corporate Sponsors: for corporate sponsors who are natural persons as well as the employees of corporate sponsors, we collect personal details such as your name, your address, identification information, your contacts, sponsorship details, business name and tax identification information. This information is collected for purposes of processing sponsorship activities.

Other Information: Personal details you choose to give when corresponding with us by phone or e-mail or through our website and online platforms, participating in our golfing events or otherwise visiting and interacting with the Club, and personal data that you provide to us when you visit the Club.

How we use your personal data

The Club processes your personal data for the following purposes:

- i. To acknowledge, confirm, and process visitor and prospective members' information, including placing you on our applicants' list where necessary. This use of your data is essential for fulfilling your interest in becoming a member of the Club.
- ii. If you are a prospective member, we use your data to deliver member information services, manage your account, and communicate with you regarding your member services. This processing is necessary to address and fulfill your requests, as well as to fulfil the relational obligations between you and us.
- iii. If you are a parent or guardian to a prospective junior member or a vulnerable person, we collect the child's or vulnerable person's data in order to process their membership information.
- iv. If you are an employee of a corporate sponsor, we use your personal data to process sponsorship activities that relate to the events that you sponsor.
- v. If you are a fee-paying guest, we use your personal data to process your engagement with the Club and to serve you appropriately.
- vi. To administer Our website and improve your browsing experience by personalising the website or enable your use of the services available on the website.
- vii. To contact you in connection with your enquiries or any complaints you make, and to utilize any information you choose to submit in response. This interaction aims to enhance our services and is contingent upon your request.
- viii. Where applicable, to notify you about changes to our service, provide you with user support and enforce our terms, conditions, and policies.
- ix. To send you email notifications which you have specifically requested;
- x. to send to you our newsletter and other marketing communications relating to our business or the businesses of carefully-selected third parties which we think may be of interest to you by email or similar technology (you can inform us at any time if you no longer require marketing communications);
- xi. In order to comply with our legal obligations, we use your data to help us detect abuse, fraud and illegal activities when there is interaction between you and us either physically or through our online platforms.
- xii. Where cookies are used on our website, we use personal data to administer our online platforms. This is used to help us to better understand how visitors interact with our website and ensure that it is presented in the most effective manner for you and for your computer/device.
- xiii. Where we collect data using Closed Circuit Television (**CCTV**) surveillance recordings, such data is used to keep you, our staff, other guests and our premises safe. CCTV devices are installed at strategic

locations to provide a safe and secure environment in the Club premises as a part of our commitment to employees' safety, members' safety, security and crime prevention.

- xiv. We may anonymize, aggregate and de-identify the data that we collect and use. Such anonymized, aggregated and de-identified data is used for our own internal business purposes, including sharing it with our current Club members, business partners, and other third parties for commercial, statistical and market research purposes. For example, to allow those parties to analyze patterns among groups of people, and conducting research on demographics, interests and behavior.
- xv. For internal business/technical operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes and as part of our efforts to keep our platforms such as the website, network and information systems secure.
- xvi. To comply with legal obligations and enforcing or defending legal rights.
- xvii. We may use your personal data for other purposes, which you consented to at the time of providing your data including but not limited to provide you with location-based services and you choose to share your precise location with us.
- xviii. On our social media pages, posters, leaflets, and other communication tools where you have given permission to the Club to photograph, video, record your image.

Sharing and Disclosing Your Personal Data

We may share and disclose your personal data with third parties in the following situations:

- (i) **Administrative and legal reasons:** if we need to disclose your personal data: (i) to comply with a legal obligation and/or judicial or regulatory proceedings, a court order or other legal process requirements from public health organization and state authorities; (ii) to enforce other applicable contract terms that you are subject to; or (iii) to protect us, our members, membership applicants, or contractors against loss or damage. This may include (without limit) exchanging information with law enforcement officers.
- (ii) **Service Providers:** the Club may hire vetted third parties to support its operations such as but not limited to, IT suppliers and contractors (e.g., data hosting providers or delivery partners) as necessary to provide IT support and enable us to provide services and other goods/services available on our online platforms.

Your Rights as a Data Subject

Subject to certain limitations under the applicable data protection law, you have the right to: -

- i. be informed of how the Club uses your Personal Data;
- ii. access your Personal Data held by the Club;
- iii. object to processing of part of or all your Personal Data. The Club may however continue to process your Personal Data if we have a legitimate reason to do so. The legitimate reason will be communicated to you upon request;
- iv. request for correction of your Personal Data by the Club where it is incorrect or incomplete;

- v. obtain and reuse your personal data for your own purposes across different services.
- vi. request for deletion of your Personal Data if it is false or misleading.

If you may wish to exercise any of the rights set out above, please contact the Club through The General Manager's Office using the email gm@muthaigagolfclub.com.

To realize the above request, we may need to request specific information from you to help us confirm your identity as a security measure to ensure that your personal data is not disclosed to any person who has no right to receive it.

Retention of Personal Data

The Club will only retain your Personal Data for as long as reasonably necessary to fulfil the purposes we collected it for including for the purposes of membership recruitment, procurement prequalification reasons, satisfying any legal, regulatory, tax, accounting or reporting requirements.

The Club may retain your Personal Data for a longer period if:-

- i. required or authorized by law;
- ii. it is reasonably necessary for a lawful purpose including instances where you have lodged a complaint or the Club reasonably believes that there is a prospect of litigation in respect to our relationship with you; and
- iii. authorized or consented by you.

Security

We have implemented robust security measures to safeguard your personal data, preventing inadvertent loss, unauthorized access, alteration, or disclosure. Access to your personal data is restricted to individuals such as employees, agents, contractors, and relevant third parties with a legitimate business need. These authorized personnel will process your personal data solely based on our instructions and are bound by a duty of confidentiality.

The Club has established procedures to address any suspected breaches of personal data. In the event of such a breach, where legal obligations exist, we will promptly notify you and the relevant regulatory authorities.

Transfer of personal data outside Kenya

We do not transfer your personal data outside Kenya. However, if your personal data is transferred outside the country, we will ensure that it is protected and that the transfer is carried out in accordance with the DPA.

Changes to this Privacy Policy

We reserve the right to update or change this Privacy Policy at any time and you should check this periodically. Any changes made to this policy will be placed on our website.

The effective date of this Privacy Policy is 1st July 2024

Contact us

Please contact us through gm@muthaigagolfclub.com in case you have any questions regarding this Privacy Policy.