

PGA European Tour Data Protection Policy

(Extract from 2022 Members Regulations Handbook)

H. Data Protection Policy - PGA European Tour

1. Policy statement

1.1 Everyone has rights with regard to the way in which their personal data is handled. During the course of our activities we will collect, store and process personal data about our Members and we recognise that the correct and lawful treatment of this data will maintain confidence in the organisation and will provide for successful business operations.

1.2 The General Data Protection Regulation (GDPR) and Data Protection Act 2018 (together, “Data Protection Law”) place additional expectations on organisations such as ours to be transparent about how we use personal data, and accountable for the uses we make of it. This means a greater emphasis on good record keeping, and raising standards of training and policy awareness among data users (namely, those working within the organisation who are responsible for handling data).

1.3 Data users are obliged to comply with this policy when processing personal data on our behalf. Any breach of this policy may result in disciplinary action.

2. About this policy

2.1 The types of personal data that PGA European Tour (“We/Us”) may be required to handle include contact details (including home address, home and mobile telephone numbers, email addresses), bank account information, credit card information (where provided), details of any discipline matters and such other information as is disclosed by a Member to us. The personal data, which may be held on paper or on a computer or other media, is subject to certain legal safeguards specified in Data Protection Law and related legislation.

2.2 This policy and any other documents referred to in it sets out the basis on which we will process any personal data we collect from Members, or that is provided to us by Members or other sources.

2.3 This policy has been approved by PGA European Tour’s Tournament Committee. It sets out rules on data protection and the legal conditions that must be satisfied when we obtain, handle, process, transfer and store personal data.

2.4 The Data Protection Officer is responsible for ensuring compliance with Data Protection Law and with this policy. That post is held Michael Cole, Chief Technology Officer, PGA European Tour. Any questions about the operation of this policy or any concerns that the policy has not been followed should be referred in the first instance to the Data Protection Officer.

3. Definition of data protection terms

3.1 Data is information which is stored electronically, on a computer, or in certain

paper-based filing systems.

3.2 Data subjects for the purpose of this policy include all Members about whom we hold personal data. A Member need not be a UK or EU national or resident. All Members have the same legal rights under GDPR in relation to their personal information.

3.3 Personal data means data relating to a Member who can be identified from that data (or from that data and other information in our possession). Personal data can be factual (for example, a name, address or date of birth) or it can be an opinion about that person, their actions and behaviour. Fully anonymised data is not personal data, but data which is pseudonymised will still be personal data if we as an organisation are able to re-identify it.

3.4 Data controllers are the people or organisations who determine the purposes for which, and the manner in which, any personal data is processed. They are responsible for establishing practices and policies in line with Data Protection Law. We are the data controller of all personal data used in our business for all our own commercial and other purposes.

3.5 Data users are those of our employees whose work involves processing personal data. Data users must protect the data they handle in accordance with this data protection policy and any applicable data security procedures at all times.

3.6 Data processors include any person or organisation that is not a data user that processes personal data on our behalf and on our instructions. Employees of data controllers are excluded from this definition but it could include suppliers which handle personal data on PGA European Tour's behalf.

3.7 Processing is any activity that involves use of the data. It includes obtaining, recording or holding the data, or carrying out any operation or set of operations on the data including organising, amending, retrieving, using, disclosing, erasing or destroying it. Processing also includes transferring personal data to third parties. Wherever a third party processes data on behalf of PGA European Tour, a data processing agreement will be in place that is compliant with Data Protection Law.

3.8 Personal data relating to racial or ethnic origins, political opinions, religious or philosophical beliefs, trade union membership, health and medical conditions, sex life or sexual orientation, genetic or biometric data used to identify an individual, all qualifies as "Special Category Personal Data." This requires that stricter conditions are satisfied before it can be processed, including (but not limited to) the explicit consent of the data subject. Relevant grounds also include safeguarding of children or adults at risk, anti-doping in sport, and the protection of integrity and standards of behaviour in sport (or at sporting events), in accordance with our relevant policies in those areas. There are also similar rules for the processing of personal data relating to criminal convictions and offences.

4. Data protection principles

4.1 Data Protection law sets out six principles relating to the processing of personal data which must be adhered to by data controllers (and data processors). These require that personal data must be:

- (a) Processed lawfully, fairly and in a transparent manner;
 - (b) Collected for specific purposes and only used for those purposes (or compatible ones);
 - (c) Relevant and limited to what is necessary for the purposes it is processed;
 - (d) Accurate and kept up to date;
 - (e) Kept for no longer than is necessary for the purposes for which it is processed;
- and
- (f) Processed in a manner that ensures appropriate security of the personal data.

4.2 The GDPR's 'accountability' principle also requires that we not only process personal data in a fair and legal manner but that we are also able to demonstrate that our processing is lawful. This involves, among other things:

- (a) keeping records of our data processing activities, including by way of logs and policies;
- (b) documenting significant decisions and assessments about how we use personal data; and
- (c) having an 'audit trail' for personal data, including for example when and how our Privacy Notice(s) were updated, how breaches were dealt with, and a record of how and when any consents were obtained (where relevant).

4.3 Data Protection Law also requires that personal data is not transferred to countries which are not within the European Economic Area (other than the United Kingdom) without adequate protection.

5. Fair and lawful processing

5.1 Data Protection Law is not intended to prevent the processing of personal data, but to ensure that it is done fairly and without adversely affecting the rights of the data subject.

5.2 For personal data to be processed lawfully, they must be processed on the basis of one of the legal grounds set out in Data Protection Law. These include, among other things, the Member's consent to the processing, or that the processing is necessary for the administration of professional golf tournaments (including Membership and entry administration purposes (such as the collection of Membership fees, mailing of all Membership communications and payment of tournament prize funds), any disciplinary actions and investigations, the performance of a contract with the Member, for the compliance with a legal obligation to which PGA European Tour is subject, or for the legitimate interest of PGA European Tour or the party to whom the data is disclosed. When special category sensitive personal data is being processed, additional conditions must be met. These may be purposes in the public interest (as set out in 3.8 above), or where it is necessary for an individual's vital interests (such as health and safety

of Members, including medical support at events); or it may be that the data is processed with the explicit consent of that person. Whenever processing personal data as data controllers in the course of our business or otherwise, we will ensure that those requirements are met.

6. Processing for limited purposes

6.1 In the course of our business, we may collect and process the personal data. This may include data we receive directly from a Member (for example, by completing forms or by corresponding with us by mail, phone, email or otherwise) and data we receive from other sources (including, for example, business partners, management companies, agents and others).

6.2 We will only process personal data for the specific purposes as noted in Clause 5.2 or for any other purposes specifically permitted by Data Protection Law. We will notify those purposes to the Member when we first collect the data or as soon as possible thereafter.

7. Notifying data subjects

7.1 When we collect personal data directly from Members, we will inform them at the point of collection:

- (a) who we are and how to contact us, including via our Data Protection Officer;
- (b) the purposes for which we process their personal data;
- (c) the legal basis for the processing, including our legitimate interests;
- (d) who we share personal data with, or at least categories of recipients;
- (e) whether we transfer personal data outside the EEA, and on what basis;
- (f) the period for which the personal data will be stored, or if that is not possible, the criteria used to determine that period;
- (g) what their rights are in respect of personal data, including the right to lodge a complaint with the Information Commissioner; and
- (h) if we need to collect their data as a requirement under contract or regulation.

7.2 If we receive personal data about a Member from other sources, we will provide the Member with this information, as well as any information we have about the source of the personal data, as soon as possible thereafter (and in any event within one month), unless it is impossible or unreasonable for us to do so.

7.3 We will also inform Members whose personal data we process that we are the data controller with regard to that data.

8. Adequate, relevant and non-excessive processing

We will only collect personal data to the extent that it is required for the specific purpose notified to the Member.

9. Accurate data

9.1 We will ensure that personal data we hold is accurate and kept up to date. We will check the accuracy of any personal data at the point of collection and at regular intervals afterwards. We will take all reasonable steps to destroy or amend inaccurate or out of date data.

10. Timely processing

We will not keep personal data longer than is necessary for the purpose or purposes for which they were collected. We will take all reasonable steps to destroy, or erase from our systems, all data which is no longer required.

11. Processing in line with data subject's rights

11.1 We will process all personal data in line with Member's rights, in particular their right to:

- (a) access data – the right to access a copy of the information that we hold about them and to obtain information about how we process it;
- (b) rectification – the right to request that we correct data that we hold if it is inaccurate or incomplete;
- (c) be forgotten – the right to ask that data be erased in certain circumstances;
- (d) restriction of processing – where certain conditions apply;
- (e) portability – the right to have the data we hold provided in an electronic format and/or to request that it is transferred to another organisation;
- (f) object to certain types of processing – such as direct marketing and automated decision making or profiling, or where data is being processed unlawfully;
- (g) withdraw consent where previously provided – although this will not affect the lawfulness of processing already carried out, or based on other grounds; and
- (h) complain to their local regulatory authority.

12. Data security

12.1 We will take appropriate security measures against unlawful or unauthorised processing of personal data, and against the accidental loss of, or damage to, personal data.

12.2 We will put in place procedures and technologies to maintain the security of all personal data from the point of collection to the point of destruction.

12.3 We will maintain data security by protecting the confidentiality, integrity and availability of the personal data, defined as follows:

- (a) Confidentiality means that only people who are authorised to use the data can access it.
- (b) Integrity means that personal data should be accurate and suitable for the purpose for which it is processed.
- (c) Availability means that authorised users should be able to access the data if they need it for authorised purposes. Personal data should therefore be stored on PGA European Tour's central computer system instead of individual PCs.

12.4 Security procedures include:

- (a) Entry controls. Any stranger seen in entry controlled areas should be reported.
- (b) Secure lockable desks and cupboards. Desks and cupboards should be kept locked if they hold confidential information of any kind. (Personal information is always considered confidential.)
- (c) Methods of disposal. Paper documents should be shredded. Digital storage devices should be physically destroyed when they are no longer required.

(d) Equipment. Data users must ensure that individual monitors do not show confidential information to passers by and that they log off from their PC when it is left unattended.

13. Transferring personal data to a country outside the United Kingdom and EEA

13.1 We may transfer any personal data we hold to a country outside the United Kingdom and the European Economic Area ("EEA"), provided that one of the following conditions applies:

(a) The country to which the personal data is transferred ensures an adequate level of protection for the data subjects' rights and freedoms.

(b) The data subject has given his explicit consent.

(c) The transfer is necessary for one of the reasons set out in Data Protection Law, including the performance of a contract between us and the data subject, or to protect the vital interests of the data subject.

(d) The transfer is legally required on important public interest grounds or for the establishment, exercise or defence of legal claims.

(e) The transfer is authorised by the relevant data protection authority where we have adduced adequate safeguards with respect to the protection of the data subjects' privacy, their fundamental rights and freedoms, and the exercise of their rights.

(f) We have in place contract clauses in a form approved by the European Commission and binding on the recipient.

13.2 Subject to the requirements in Clause 13.1 above, personal data we hold may also be processed by staff operating outside the United Kingdom and the EEA who work for us. That staff maybe engaged in, among other things, the fulfilment of entries to our events, the processing of payment details and the provision of administrative services.