

Privacy Policy for Member Register

21.9.2026

NOTE! This english version is generated by machine translation and should be considered as indicative only. The official text is the Finnish "Jäsenrekisterin tietosuojaseloste". Any discrepancies or differences created in the translation are not binding and have no legal effect for compliance or enforcement purposes.

1 Contact details of the controller in data protection matters

Controller	Helsingin IFK Golf ry Business ID: 1956139-3
Contacts in all data protection matters	The Data Subject may contact the Controller in all matters related to data protection as follows: Anna Fagerholm, Service Manager Address: Kuusmiehentie 13 Phone: 0440 100602 Email: toimisto@hifkgolf.fi

2 Data subjects and data collected about them

According to the rules of HIFK Golf ry ("**HIFK Golf**"), HIFK Golf is a member association of Idrottsföreningen Kamraterna, Helsingfors (HIFK, Helsingfors) rf ("**HIFK**") and the Finnish Golf Union ry ("**Finnish Golf Union**"). When a person joins HIFK Golf as a member, they also join HIFK and the Finnish Golf Union at the same time and report their member details on the same membership application to HIFK Golf, HIFK, and the Finnish Golf Union.

Data subjects (individually "**Data Subject**" and together "**Data Subjects**") are all members of HIFK Golf ("**Members**").

HIFK Golf collects the data presented in the following table about the Data Subjects.

Data Category	Description	Data Source
Member register data	· Name, domicile	· Data Subject (member notification, update notifications) · Changes to name and domicile (HIFK, eBirdie)
· Data Subject (member notification, update notifications)	· Data Subject (member notification, update notifications)	· Data Subject (member notification, update notifications)
	· <u>Membership relationship data:</u> type of membership relationship (e.g., active member, full member, supporting member, honorary member) and duration, data related to the start and	· Controller

	termination of the membership relationship	
	· <u>Contact details</u>: phone number, email address, and postal address (for a minor Member, also the contact details of the guardian)	· Data Subject (member notification, update notifications) · Changes to contact details (HIFK, eBirdie)
Insurance details	· Details of insurance policies (licenses) taken by the Finnish Golf Union for the Member	· Data Subject, insurance company
Participation data	· <u>Activity organization data</u>: invitation, registration, and participation details related to competitions, events, and activities organized by the Controller · <u>Health data</u>: necessary dietary and accessibility details · <u>Photos</u>: photographs, videos	· Data Subject · Controller
Competition results	· Name, result, placement	· Controller and other competition organizers
Membership and other payment details	· Data concerning billing and collection of membership fees, various participation and other fees	· Controller
Newsletter data	· Email address, data concerning subscription, cancellation, dispatch, receipt, and reading	· Data Subject · IT systems of the Controller and its subcontractor
Prohibitions and consents	· Consents regarding electronic direct marketing and prohibitions regarding traditional direct marketing · Minor Member's guardian's consents to membership, publication of photos and data, marketing, etc.	· Data Subject
Other data	· Any other data provided by the Data Subject themselves and data collected from other sources with their consent	· Data Subject and other parties

3 Purposes and legal bases of processing personal data

The purpose of HIFK Golf is to promote physical activity and sports, as well as related civic activities within the operating area of HIFK Golf, so that everyone has the opportunity to engage in and participate in fitness and health-enhancing physical activity, competitive and elite sports, or related association activities according to their capabilities and needs.

HIFK Golf carries out its purpose by offering:

- fitness and health physical activity
- competitive sports
- day, club, guidance, training, and coaching activities
- communication and public relations activities
- educational activities

For the aforementioned purpose, HIFK Golf processes the personal data of Data Subjects mentioned in section 2 for the purposes presented in the following table.

Purpose of Processing	Data Categories Processed	Legal Basis
HIFK Golf's administration, representation, and communication in relation to third parties.	· Data concerning position of trust	Legitimate interest of HIFK Golf based on the membership relationship of sports associations (GDPR Article 6(1)(f))
Maintaining member register	· Member register data	Compliance with a legal obligation (GDPR Article 6(1)(c), Association Act Section 11)
Sending newsletter	· Newsletter data	Subscriber's newsletter order, i.e., performance of a contract (GDPR Article 6(1)(b))
Organization of activities, i.e., organizing and implementing events, discussion and educational sessions, and other activities, sending invitations, verifying membership, and other member communication and contact	· Member register data · Other membership data · Participation data	Legitimate interest of HIFK Golf based on membership relationship (GDPR Article 6(1)(f))
	· Health data	Consent of the Data Subject (GDPR Article 6(1)(a))
Organizing competitions	· Contact details · Basic details · Insurance details · Participation data · Competition results	Legitimate interest of HIFK Golf based on membership relationship (GDPR Article 6(1)(f))

Informing about activities in the media, on the Internet, in social media	· Photos	Consent of the Data Subject (GDPR Article 6(1)(a))
Statistics, comparison, and publication of competition results in the media, on the Internet, in social media	· Competition results	Legitimate interest of HIFK Golf based on membership relationship and competition participant relationship (GDPR Article 6(1)(f))
Statistics and reporting for operational development and, e.g., applying for grants	· Member register data · Other membership data · Activity organization data	Legitimate interest of HIFK Golf based on the right to engage in association activities and membership relationship (GDPR Article 6(1)(f))
Traditional direct marketing by phone or mail	· Member register data · Other membership data · Activity organization data · Prohibitions and consents	Legitimate interest of HIFK Golf based on membership relationship (GDPR Article 6(1)(f))
Electronic direct marketing	· Email address · Member register data · Other membership data · Activity organization data · Prohibitions and consents	Consent of the Data Subject (Act on Electronic Communications Services Section 200) Legitimate interest of HIFK Golf based on membership relationship (GDPR Article 6(1)(f))

4 To whom data is disclosed or transferred

The Controller discloses personal data of Members to the following parties:

Recipient	Disclosed Data Categories	Purpose
All other Members	· Member statistics	Member's right to inspect Member register data (Association Act Section 11)
Member who demonstrates that their interest as a member of HIFK requires it	· Other Member data	
HIFK	· Data concerning position of trust · Member register data of Members and changes in contact details	Determining HIFK Golf's sports association fee, updating HIFK Golf's membership data

External competition organizers	· Contact details · Basic details · Insurance details	For organizing the competition, when HIFK Golf handles group registration
Controller's subcontractors and partners	· Name and contact details, other separately defined data of the Data Subject	Fulfilling the purposes of the register, e.g., delivering agreed products, services, or other performances
Insurance companies	· Member register data, other membership data	Handling insurance matters (licenses) taken by the Finnish Golf Union for the Member
Finnish Golf Union	· Competition results	Tracking results and statistics at the union level
Media, social media	· Competition results	Publishing to the general public

Otherwise, data will not be disclosed to third parties without the consent of the Data Subject, unless necessary to fulfill the legal obligations of the Controller, in connection with legal proceedings, at the request of authorities, or for scientific research or statistical purposes.

The Controller has the right to use subcontractors in processing personal data in accordance with this policy. In this case, personal data may be transferred to subcontractors to the extent necessary to implement the subcontractor's services. The Controller uses subcontractors at least in the following tasks:

- Electronic membership service through which the Controller manages the member register and member communication (Taikala Oy, MyClub service)
- Electronic membership service through which the Controller manages the member register, billing, event registration, participation tracking, and member communication (Ready Golf Oy)
- Newsletter distribution (Creamailer Oy)

Subcontractors process personal data on behalf and for the account of the Controller in accordance with the Controller's instructions. Subcontractors are bound by agreements made with the Controller on personal data processing, including terms regarding confidentiality and data security.

Personal data may also be transferred for processing outside the EU/EEA area. Unless the European Commission has decided that the level of data protection in the destination country is adequate, the Controller ensures appropriate data protection by entering into written agreements with subcontractors using standard contractual clauses approved by the European Commission or another lawful procedure. Standard contractual clauses can be found at:

https://commission.europa.eu/system/files/2021-06/1_en_annexe_acte_aunome_cp_part1v5_0.pdf

5 Principles of personal data protection

Only officers and employees of the Controller and employees of its subcontractors who have the right to process data in this register by virtue of their duties or work are authorized to use the system containing personal data.

Manual materials are stored in locked premises corresponding to the protection level of the data. Personnel processing data and subcontractors are bound by confidentiality obligations. The protection of electronically stored data is based on access control management, technical protection of databases and servers, physical protection of premises, access control, protection of telecommunications, and data backup. Access to the electronic content of the register for persons processing data is protected by personal usernames and passwords. Access and processing rights to data are granted based on job duties.

6 Retention periods for personal data

Personal data is retained during the membership relationship and for 3 years after its termination, or until all rights and obligations between HIFK Golf, the Finnish Golf Union, and the Member have ended.

Data collected on the basis of consent is retained in accordance with the consent and removed if the Data Subject withdraws consent, unless there is another legal basis for further retention.

Membership and other payment data is retained in accordance with the Accounting Act for six years from the end of the calendar year in which the financial year ended.

Data concerning positions of trust, documents describing HIFK Golf's activities, e.g., meeting minutes, competition results, photographs, videos, and audio recordings taken at events, correspondence, activity reports and plans, speeches, presentations, articles, and anniversary materials, as well as personal data contained therein, may be retained permanently in accordance with Section 4 of the Data Protection Act and Article 6(1)(e) of the Data Protection Regulation.

Data may be stored beyond the aforementioned retention periods for the establishment, exercise, or defense of legal claims until the claims have been final and bindingly resolved, and in accordance with applicable statutory requirements.

7 Right of access, rectification, and other rights of the data subject

The Data Subject has the right to inspect the personal data concerning themselves stored in the personal register and to demand the rectification or erasure of incorrect, outdated, unnecessary, or unlawful data. The Data Subject also has the right to withdraw their previously given consent for the processing of personal data at any time. The withdrawal of consent does not affect the lawfulness of processing based on consent before its withdrawal.

If the Data Subject has provided their personal data to the Controller and the processing is based on consent or a contract, they have the right to receive this data in a structured, commonly used, and machine-readable format and the right to transmit this data to another controller in accordance with applicable legislation.

When the processing of personal data is based on legitimate interest, the Data Subject has the right to object to the processing of their data on grounds relating to their particular situation. The Data Subject must specify the particular situation on which the objection is based when making the request.

In situations defined by law, the Data Subject may request the restriction of processing of their personal data, for example, suspending it entirely or partially when the Data Subject believes there is uncertainty about the accuracy of the data or its accuracy or processing.

Requests should be submitted in person, by letter, or by email using the contact details in section 1. The Controller may, if necessary, ask the Data Subject to specify their request in writing and prove their identity.

The Data Subject has the right to lodge a complaint regarding the processing of personal data with the Data Protection Ombudsman.