



Billericay Lawn Tennis Club Limited Data Protection & Privacy Policy

For the purposes of the General Data Protection Regulation ("GDPR") and UK data protection laws, the Controller is John Pullin of Billericay Lawn Tennis Club Limited (BLTC).

About this document

This privacy policy explains how BLTC collect, use and share your personal data, and your rights in relation to the personal data BLTC holds. This privacy policy concerns the processing of personal data of employees, members, volunteers and BLTC officers.

How we collect your information

BLTC may collect your personal data in a number of ways, for example:

- from the information you provide to us when you interact with us by making an application for a job, membership or a volunteer or other BLTC position, for example when you come for an interview or when you submit a formal application for membership and provide your personal data in application forms and covering letters, etc.
- from third parties, for example your previous or current employers in relation to your application to work or volunteer for us;
- during the course of your membership or engagement as a volunteer or officer with us, for example when you provide your contact details to our membership secretary, when you or another member of the committee completes paperwork regarding your membership appraisals, and as may be generated in connection with your membership or other relationship with us more generally.

The types of information BLTC collect

BLTC may collect the following types of personal data about you (and your family members and 'next of kin', where relevant):

1. Contact and communications information, including:
 - your contact details (including email address(es), telephone numbers and postal address(es))
 - contact details (through various means, as above) for your family members and 'next of kin'
 - records of communications and interactions we have had with you.
2. Biographical, educational and social information, including:
 - your name, title, gender, nationality and date of birth
 - your image and likeness, including as captured in photographs taken for business purposes
3. Financial information, including:
 - your bank account number(s), name(s) and sort code(s) (used for paying your subscriptions and processing other payments);

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- Gift Aid declaration information, where relevant.

- 4. Membership related information, including
 - details of your previous club in the case of club coach your previous employer(s);
 - your personal data captured in the membership activities you create whilst playing, volunteering or engaged in work

- 5. Any other information relevant to your membership or employment or engagement to work for BLTC.

BLTC may also collect special categories of data (and criminal convictions and offences data) including:

- Information revealing your racial or ethnic origin (for example, recording a member of staffs racial or ethnic origin in order to monitor our compliance with equal opportunities legislation)
- Information concerning your health and medical conditions (for example, where required to monitor and record sickness absences, take decisions as to an individual's fitness for work, for dietary needs, or to make reasonable adjustments to your working conditions or environment.)
- Information concerning other characteristics such as sexual orientation (for example, in the course of investigating complaints made by you or others, for example concerning discrimination)
- Information about certain criminal convictions (for example, where this is necessary for due diligence purposes or compliance with employment law)

Where this is necessary for your employment or other engagement to work or volunteer for BLTC

How BLTC may use your information

The purposes for which BLTC may use personal data (including special categories of personal data and criminal convictions and offences data, where applicable) BLTC collect in connection with your membership or other engagement with BLTC

- administering job, volunteer or officer applications and, where relevant, offering you a job or other positions with BLTC
- carrying out due diligence checks on you during the application process for a role, including by checking references in relation to your education and your employment history;
- once you are employed or engaged by us in any capacity, for the performance of the contract of employment (or equivalent agreement) between you and BLTC;
- to pay you and to administer benefits in connection with your engagement with BLTC
- for security purposes, including by operating security cameras in various locations at BLTC premises

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- for preventing and detecting crime, and to investigate complaints and grievance
- for recording incidents in the BLTC accident book or other incident recording
- dealing with legal claims and requests, including those made under data protection law, or requests for disclosure by competent authorities
- external and internal audit and record-keeping purposes
- sharing your personal data with the LTA, county tennis associations and other venues for reasonable purposes in connection with the operation of BLTC

The basis for processing your information

BLTC may process your personal data for the above purposes because

- it is necessary for the performance of a contract with you (your membership details or equivalent) or in order to take steps at your request prior to entering into such a contract
- it is necessary for BLTC or a third party's legitimate interest. BLTC "legitimate interests" include reasonable interests in the operation of the BLTC, in accordance with all relevant legal requirements
- it is necessary to protect your or another person's vital interests (in certain limited circumstances, for example where you have a life-threatening accident or illness in the workplace, and we have to process your personal data in order to ensure you receive appropriate medical attention)
- it is necessary for the establishment, exercise or defense of legal claims (for example, to protect and defend BLTC rights or property)
- BLTC have your specific or, where necessary, explicit consent to do so (in certain limited circumstances, for example where you provide details of your racial or ethnic origin so that we can monitor our compliance with equal opportunities legislation)
- for compliance with legal obligations (e.g. to exercise or perform any right or obligation conferred or imposed by law in connection with employment or for the prevention and detection of crime, and in order to assist with investigations (including criminal investigations) carried out by relevant authorities

Sharing your information with others

BLTC may share your personal data with certain third parties for the purposes set out in this privacy policy. BLTC may share some personal data with third parties including:

- internal and external auditors and legal advisers
- when BLTC are legally required to do so (by a court, government body, law enforcement agency or other authority of competent jurisdiction), for example by HM Revenue and Customs

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- to a third-party acquirer or investor where there is a reorganisation or sale of all or part of the business (or during negotiations for such a sale or reorganisation). In such a case BLTC will take appropriate measures to ensure the security of your personal data
- to the LTA or county tennis associations.

How long information is kept

BLTC will keep your personal data only as long as is necessary for each purpose it is used for including accounting, tax reporting, record keeping and legal reasons.

Your Rights

Under certain circumstances you have the right by law to:

- Request access to your personal data. This enables you to receive a copy of the personal data that is held by BLTC about you and to check that BLTC are lawfully processing it.
- Request correction of the personal data that is held at BLTC about you. This enables you to have any incomplete or incorrect data held about you corrected.
- Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have exercised your right to object to processing (see below).
- Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal data for direct marketing purposes.
- Request the restriction of processing of your personal data. This enables you to ask us to suspend the processing of personal data about you, for example if you want us to establish its accuracy or the reason for processing it. You can also withdraw your consent, where this is the basis for our processing your information (without affecting the lawfulness of our previous processing based on consent).
- Request the transfer of your personal data to another party

Please note that the above rights are not absolute, and we may be entitled to refuse requests where

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exceptions apply.

If you have given your consent and you wish to withdraw it, please contact John Pullin, using the contact details set out below

Contact and complaints

If you have any queries about this privacy policy or how we process your personal data, or if you wish to exercise any of your rights, you may contact JOHN PULLIN

e mail treasurer@billericayltc.co.uk

or in writing to Billericay Lawn Tennis Club Limited. Blunts Wall Road, Billericay, Essex CM12 9SA

If you are not satisfied with how BLTC are processing your personal data, you can make a complaint to the Information Commissioner.

You can find out more about your rights under applicable data protection legislation from the Information Commissioner's Office website available at www.ico.org.uk.