



# **Blairgowrie Tennis Club**

# PRIVACY POLICY FOR OUR MEMBERS

## **Introduction and About Us**

This privacy policy explains how **Blairgowrie Tennis Club** (referred to in this document as 'BTC', 'the Club', we, our, or us) collects, uses, and shares our members' personal data. We want to make sure all the personal details we hold about you are safe and secure. This policy has been created because you have a right to know what and how personal details are used, and a right to see what information we have. The Club complies with General Data Protection Regulations (GDPR) with effect from 25 May 2018.

The Club is a primary **Data Controller**. This means we have control over how your details are used and who we pass them on to. Some organisations must have a **Data Protection Officer** to ensure personal information is looked after. We don't need a Data Protection Officer. Contact <u>GovernanceBTC@gmail.com</u> if you have any questions.

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#### What Information We Collect From You?

We may collect the following personal details about you before, during or after your time as a member, such as:

- Contact details: your name, address, email address and phone number
- your birthday (juniors only)
- membership details including when you signed up to be a member and any date you decide to leave us
- all records of when you contacted us, or we contacted you by email or when you asked us to do something
- o videos and photos of you
- details of family members, coaches and other people we might need to contact in case of an emergency
- records of your ranking, grading or rating, including any competition results, what events/matches/games you have attended and how well you are performing on any development programme you are registered to
- any disciplinary information or details of any issues you have with us or we have with you; and
- o accident reports.

#### **How We Collect Your Information**

We collect your personal data in a few ways:

- directly from you, when you complete an application for membership, when you
  make enquiries on our website/social media, when you provide information on
  the Club's management software or court booking system (ClubSpark), or when
  you interact with us during your time as a member in various other ways (for
  example, where you enter a competition, renew your membership, sign up for a
  course or lessons)
- from someone else who has applied for membership on your behalf (for example a family member or your tennis coach who has provided us with your contact details for that purpose) and
- from the LTA (for example, where the LTA passes on your details to us in connection with a complaint or query you have raised about our Club).

# The Lawful Basis for Processing Personal Data (Why?)

# **Legitimate Interests**

The Club has 'legitimate interests' for processing personal information about individuals we interact with. Our main legitimate interest is to manage the Club and safeguard the integrity of the sport. For example, we need to process personal data to:

 communicate directly with you in our weekly 'What's On' email (all addresses are private and not shared/visible) and WhatsApp subscription about events, weekly timetables, and availability of courts



- organise competitions and matches, process and publish results, ratings and rankings data from competitions, including disciplinary data, records of code violations, and other personal data
- market products and services (including Wimbledon tickets, BTC merchandise, performance and participation programmes, coaching courses and events), and promote tennis generally
- ensure the security of LTA events and premises, including by recording individuals' photographs as part of event accreditation processes and capturing individuals' images using CCTV monitoring
- keep appropriate records of coaches and volunteers and
- o administer our performance programme (for example, monitor player progress or make player selection decisions).

We have considered whether our interests (using legitimate interest as lawful basis) are overridden by the interests of the individuals whose data are being processed and concluded that the processing is, on balance, fair.

#### **Vital Interests**

We may also hold and use what is called special information about your health such as any injuries you have/have had or details of any medical conditions that may affect you while playing at the Club. This processing is necessary to protect a player and to provide medical care and treatment in emergency situations, for example:

- o diabetes, allergy (food, insect etc.), asthma
- injuries or disabilities that may restrict or alter your ability to participate in tennis or related activities
- o only the relevant people are given this information eg coaches.

For more information on your rights and the lawful bases for processing personal information, you can visit the Information Commissioner's Office website at: <a href="https://ico.org.uk/for-organisations/uk-gdpr-guidance-and-resources/lawful-basis/a-guide-to-lawful-basis/">https://ico.org.uk/for-organisations/uk-gdpr-guidance-and-resources/lawful-basis/a-guide-to-lawful-basis/</a>.

#### How We Use Your Information?

Personal data will be used as indicated at the time of collection. Generally, we will use your personal data for the following purposes:

#### Administration of Your Club Membership, including:

- o informing you about court/facilities opening hours
- taking payment of membership fees
- fulfilment of orders for goods; and services, including court bookings, buying merchandise
- o administration of the Wimbledon ballot
- to help you if you have a question or you are unhappy with something we have done



- we will keep all your details on file so we can deal with any membership issues and to manage your membership. Sometimes we may keep your details because the law tells us we have to (up to 6 years for accounting, tax reporting and record-keeping purposes)
- storing your details on the software platform we use for our online club member management database/court booking system (ClubSpark). (Please note that your own use of the software or system is subject to the Terms and Conditions and Privacy Policy published on that site; where this is necessary for our legitimate interests, for example in increasing use of our club's facilities and participation in the game generally) and
- o communication about our club activities that we think may be of interest to you
- we will review stored personal data periodically and delete or anonymise anything that is not required.

#### **Health and Safety**

- o if we use any 'special information', we will do so only on the basis of one of the 'special reasons' listed above;
- we may use details about your health (including any injuries or disability) to make sure you are playing in a safe environment by making changes to the design of our sports facilities and to ensure you are well enough to participate;
- to make sure we are keeping up with health and safety, details of coaching, events and competitions you have attended, it is in our interests to make sure we provide you and others like you with a safe place to play your sport. To comply with the law, we may have to keep your details for up to 6 years;
- to put together all the information we need in case there are any disciplinary or other issues with your membership. It is in our interests to make sure we provide you and others like you with a safe and fair place to play your sport (for example: accident reports, behaviour issues); and
- to arrange for any trip or transportation to and from an event, any ID cards or passport information you give us, details of family members and emergency contacts, and details about your health.

# Promoting the Club and the Sport

- our events and membership packages, any photos or videos of you may be used in newspapers, Facebook/Meta, and Twitter/X;
- o bonus ball administration and payment of any prize money; and
- promoting our club and promoting goods and services of third parties (for example, equipment suppliers, operators of coaching courses, and organisers of tennis events) where we think this will be of interest to you; where this is necessary for our legitimate interests (or the legitimate interests of a third party).



## **How Can You Stop Us Contacting You?**

Sometimes we may wish to contact you by email, WhatsApp, post or text message to tell you about things that may interest you. Email is our preferred method of communication. You can tell us to stop at any time by emailing blairgowrietennisclub@live.com.

Also look out for the link at the bottom of any messages we send which can put a stop to any messaging.

You can tell us to stop using your personal data at any time, by contacting blairgowrietennisclub@live.com.

# Who Else May Use Your Details?

We may send your details to others to help us run our organisation. These are:

- The Government or our regulators: where the law tells us to do so or to help them with any investigations
- Police, law enforcement and security services: to help them with any investigation, prevention of crime or matter of national security.

#### **Are Your Details Safe?**

We have put in place security measures to make sure your details don't go missing or get used in a way they shouldn't be, for example, all data stored on ClubSpark is password protected and is available only to our Membership Secretary and coaches. Any paper information is stored securely in a locked container.

**Did You Know?** All 'data controllers' based in the European Union and the UK are subject to laws that make sure your personal details are safe?

**Keep Us Informed** It is important to make sure that the details we hold about you are accurate and up-to-date, so make sure to let us know if anything like your email address or phone number changes. You can do this by emailing: <a href="mailto:BNTCsecretary@gmail.com">BNTCsecretary@gmail.com</a> or logging in to your ClubSpark account and changing your account details.

# What Are Your Rights?

You can ask us to do lots of things with your details, for example:

- to tell you how your details are being used
- o to provide you with a copy of all details we hold on you
- o to correct some of the details we hold if they are not correct or out of date
- o to delete all of the details we hold on you (unless we have a good reason not to)
- to stop using your details in a certain way.



Some of the rights may not always apply to the personal details we hold for you as there are requirements and exemptions which means we need to hold on to certain information and other times the rights may not apply at all.

More information about these rights can be found online here <a href="https://ico.org.uk/for-the-public/">https://ico.org.uk/for-the-public/</a>. If you have any questions or are unhappy about something, please contact us at <a href="mailto:GovernanceBTC@gmail.com">GovernanceBTC@gmail.com</a>. If you are not satisfied with how we 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 laws from the Information Commissioner's Office website at <a href="https://ico.org.uk/">https://ico.org.uk/</a>.

# What Happens If This Policy Gets Changed?

The most up-to-date policy version is available on ClubSpark.

#### **How You Can Get in Touch?**

You can get in touch with one of our team by emailing <a href="mailto:BNTCsecretary@gmail.com">BNTCsecretary@gmail.com</a>. If you have any queries about this policy, in the first instance you can email <a href="mailto:GovernanceBTC@gmail.com">GovernanceBTC@gmail.com</a>.

#### **Revision Control**

Revision Date	Changes/Reason for change
May 2018	Original release for GDPR compliance
Nov 2020	Add WhatsApp subscription to Legitimate Interest section; minor editorial changes.
Mar 2024	Policy review, minor additions to clarify storage periods, WhatsApp, X, Meta.