# Bohemian Tennis Club PRIVACY POLICY



This Privacy Policy has been adopted by Bohemian Tennis Club ("the Club"), Benson Park, South Ridge, Brunton Park, Newcastle Upon Tyne NE3 2EJ, for the purposes of the General Data Protection Regulation ("GDPR") and UK data protection laws.

#### About this document

The Club has approved this privacy policy to make sure you are aware of how the Club uses personal data. It sets out the way we collect, store, use and process personal data about members, their parents, carers or guardians, including current, past and prospective members; those who attend tennis coaching sessions (but are not members), those individuals and companies who provide goods and services to the Club and those who attend or communicate with the Club for any legitimate purpose.

The Club is the data processor for the purposes of data protection laws, including the General Data Protection Regulation 2018 (GDPR) and the Data Protection Act 2018.

#### **Related Parties**

This privacy policy applies to the Club and to its' dealings with the The Lawn Tennis Association and other organisations in order to fulfil our legitimate purpose as a tennis club.

## How we collect your information

We may collect your personal data in a few limited ways, namely:

- Directly from you, when you apply for membership of the Club, make enquiries on our website, or when you interact with us in various other ways (for example, where you enter a competition, tournament or league organised by us, sign up for a course or lessons, provide support to us in a financial or in kind capacity or where you are invited to attend a Club event as a spectator or parent);
- 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 the Club as a tennis venue).

#### The types of information we collect

We may collect the following types of personal data about you:

- Contact and communications information, including your contact details (including email address(es), telephone numbers and postal address(es) and records of communications and interactions we have had with you);
- Media Consent Forms when attending coaching, any special courses or events held at the Club:
- Financial information, including Standing Order details or Account reference details where you have opted to pay membership subscriptions or any other payments due to the Club by direct transfer;
- Certain other information which you volunteer when making use of our services (for example, when entering a competition or tournament).
- Details about you or your child's health or medical conditions, where you have volunteered this.

## **Special Category data**

Some of the information we hold is what is classed as special category data. Special category data includes any information concerning health (including dietary information) We have a duty of care to process some special category data about our members and those who attend coaching sessions, to ensure their health and wellbeing and for welfare and safeguarding purposes. Under data protection law we must fulfil additional criteria to lawfully process special category data, which are listed below.

#### How we use personal data

Personal data provided to us will be used for the purposes set out at the time of collection and, where relevant, in accordance with any preferences you express.

More generally, we will use your personal data for the following purposes:

- Administration of competitions and tournaments, including:
  - o informing you of details of a competition, league or tournament e.g. start date, location, match times;
- Administration of the Club's membership programme;
- Fulfilment of orders for goods and services, including court bookings;
- Administration of the Wimbledon ballot:
- Research and statistical analysis about who is playing tennis at our Club;
- Communication about our activities that we think may be of interest to you;

(where this is necessary for our legitimate interests - for example in increasing participation in the game generally);

Promoting our County Association 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), and/or where we have your consent, as applicable.)

- To administer appropriate first aid to you or your child, if required;
- To ensure any catering we provide (for example, refreshments after a tournament or match) is appropriate for your or your child's dietary requirements and/or allergies.

## Our legal basis for using this data

We only collect and use personal data when the law allows us to. Most commonly, we process it where:

- We are performing a contract with you;
- We need to comply with a legal obligation;
- We need it to perform an official task in the public interest;
- We need it to pursue our legitimate interests.

We may also process personal data in situations where:

- We have obtained consent to use it in a certain way;
- We need to protect the individual's vital interests (or someone else's interests).

To process special category data we need an additional lawful basis. We will process special category data most commonly where:

- We have explicit consent;
- The processing is necessary under social security or social protection law;
- We are processing it in the vital interests of an individual;
- We are providing first aid treatment.

Where we have obtained consent to use personal data, this consent can be withdrawn at any time. We will make this clear when we ask for consent, and explain how consent can be withdrawn.

Some of the reasons listed above for collecting and using personal data overlap, and there may be several grounds which justify our use of this data.

#### Your marketing preferences

We will always respect your wishes in respect of what type of communications you want to receive from us and how you want to receive them. There are some communications, however, that we need to send you in order for us to fulfil our obligations to you. Examples of these essential service communications are:

• Club membership renewal communications which are issued to existing and prospective new members before the commencement of a new membership year.

- Communications related to events coming up in the club that you may be interested in, including coaching courses, competitions and social events aimed at members.
- Communications related to any competition, league or tournament that you have entered, including communications letting you know details of the relevant event and any changes you need to be aware of.

You are in control of how we communicate with you. You can update your choices and/or your contact details by contacting the Club Secretary at: <a href="mailto:bohemiantennis@hotmail.co.uk">bohemiantennis@hotmail.co.uk</a>

#### How we store this data

We keep personal information in paper and electronic form. This is always kept securely and access to it is limited to relevant members of the Club's management committee.

# Sharing your information with others

We do not sell or share your personal data for other organisations to use other than as set out below.

Personal data collected and processed by us may be shared with the following third parties, where necessary:

- Our Club Committee Officers for the purposes of administering any goods or services that you have requested from us (e.g. administration of competitions, leagues and tournaments).
- Tennis coaches and other coaching staff whose services are engaged by the Club.
- The Northumberland Lawn Tennis Association and other sports governing bodies as appropriate – eg Sport England for the purpose of statistical analysis of eg membership categories.
- The Lawn Tennis Association Our Club's Welfare Officer.

#### How long your information is kept

We keep your personal data only for as long as necessary for each purpose we use it. For most data, this means we retain it for a period of six years after your last interaction with us (for accounting, tax reporting and record-keeping purposes).

### Your rights

Under certain circumstances, by law you have the right to:

- Request access to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate information we hold 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 data (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 exceptions apply.

## 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 legal rights, you may contact: Aidan Mernin, Club Chairman:

- by email: bohemiantennis@hotmail.co.uk
- by telephone: 0191 236 5935
- or by post: Bohemians Tennis Club c/o 1 Davenport Drive, Brunton Park, Newcastle Upon Tyne NE3 5AE

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: www.ico.org.uk.