



BROSELEY
TENNIS CLUB

Privacy Policy of Broseley Tennis Club, Duke Street, Broseley, TF12 5LX

1. Introduction

Broseley Tennis Club respects your privacy and is committed to protecting your personal data.

For the purposes of this policy the term Club means both Broseley Tennis Club and Broseley Lawn Tennis Club, the term Member means member of the Club, and the term Membership means membership of the Club.

The Club is a data controller for the purposes of the Data Protection Act 2018, the UK GDPR and any other data protection legislation applicable in the UK from time to time. This means that the Club is responsible for deciding how the Club holds and uses personal information about you. The Club are required under data protection legislation to notify you of the information contained in this Privacy Policy. This policy describes the Club's role as a data controller in line with the legislation.

The policy is available to view in the clubhouse in the policies folder and is also available on the Club website.

The Club reserves the right to amend this Privacy Policy from time to time without prior notice. You are advised to check the Club notice board or the policies folder in the clubhouse regularly for any amendments (amendments will not be made retrospectively).

The date the policy was last updated is printed at the bottom of the pages so that you can see easily if there has been an update.

The Club's preferred methods of communication are by email and WhatsApp, other methods will also be used where appropriate, using the contact details provided to the Club. The Club will always endeavour to use the "blind copy" function on Club emails to Members so that your email address is not made visible to others. Contact phone numbers are visible to other Members on WhatsApp and should you not want your contact phone number to be made available to other Members then please notify the Club and leave the appropriate WhatsApp group.

Please note that links on the Club website may take you to external websites which are not covered by this policy. The Club recommend that you check the privacy policies of these websites before submitting any personal information to them. The Club will not be responsible for the content, function or information collection policies of these external websites.

2. What personal data do the Club collect about you?

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

2.1 How and why do the Club use your personal information?

It is necessary for the Club to use your personal information to provide and make available the services and benefits you receive as a Member or a user of the Club and its facilities. In order for the Club to process your application to join as a Member of the Club, use the Club tennis courts or receive any other service from the Club, there is a contract between you and the Club. The Club needs to use your personal data in order to perform the Clubs side of that contract.

The Club have set out below, a description of the ways the Club may use your personal data, and which of the legal bases the Club relies on to do so.

2.1.1 Summary of information held and the legal basis of processing

Types of Information that may be held	Purposes	Legal Basis of Processing
Name, gender and contact details – address (for Members), telephone number and email address.	1. Membership administration. 2. To keep contact (e.g. Open Day attendee or past Member) informed of relevant information and activities.	1. To perform the Clubs contract with the Member to deliver the benefits of Membership. 2. For the purposes of the Clubs legitimate interests in operating the Club and providing relevant information to the contact.
Date of birth/age if under 18	1. Managing age related Membership categories. 2. Other activities which may be age related.	1. To perform the Clubs contract with the Member to deliver the benefits of Membership. 2. For the purposes of the Clubs legitimate interests in operating the Club and performing the Club’s contract with the Member or other contact.
Accounts information such as payments and key deposits.	Membership administration.	To perform the Clubs contract with the Member to deliver the benefits of Membership.
Club keys held	To request key return and repay any deposit.	To perform the Clubs contract with the Member to deliver the benefits of Membership.
Emergency contact details and health information (if provided)	To be used in the event of an emergency.	Protecting the Member’s vital interests and those of their dependants.
Relevant information from interactions with you, e.g. communications, tennis interests, how heard of club	Managing the Member’s Membership of the Club and helping the club to improve Member services.	To perform the Clubs contract with the Member to deliver the benefits of Membership.
Members WhatsApp groups	To enable Members to be kept up to date with Club activities	Performing the Clubs contract with the Member, providing the Member access to Membership benefits and services. A Members contact phone

		number may be visible to other Members participating in the same or similar activities. If a Member does not wish their contact phone number to be available to other Members then the Member should notify the Club and remove themselves from the associated WhatsApp group. Removal from WhatsApp may reduce a Members access to Club benefits and services.
Contact preferences	Where the processing is not essential e.g. for passing contact details to the coach.	Consent. An option is given, when applying for membership online and on relevant forms, to ensure compliance with the Member's preferences.
Photography consent information	In line with the Clubs Photographic Images policy	Consent. Options on relevant forms enable compliance with the Member's preferences.
Attendance at the Club	<ol style="list-style-type: none"> 1. To allow Court Booking, and monitor court usage. 2. To maintain a record of Club session attendance e.g. when required for Covid test and trace. 	<ol style="list-style-type: none"> 1. To perform the Clubs contract with the Member to deliver the benefits of Membership. 2. Protecting the Member's vital interests and those of their dependants.
National Insurance number	Required for a limited number of Committee member roles.	Legal obligation – requires for "Fit and Proper Person" form completed by the volunteer.

2.1.2 How the Club processes your personal information

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

2.1.2.2 The Club will use your personal data for the following purposes:

- a) Administration of your Club Membership, including:
 - informing you about court / facilities availability;
 - renewal information, taking payment of Membership fees, record of keys and deposits;
 - Administration of the Wimbledon ballot;
 - Communication about Club venue activities that the Club thinks may be of interest to you;
- b) To allow the Club to add Member's details to the Clubspark account to assist Club administration where the membership application has not been made online through the Club website.
- c) Promoting Club venue and promoting goods and services of third parties (for example activities run by our coaching provider and organisers of tennis events) where the Club thinks this may be of interest to you.

- d) Analysis, for example of who is playing tennis in Club venue.
- e) Complying with the law, e.g. if required to provide information to the government Test and Trace system, or “Fit and Proper Person” form required by HMRC, for CASC status, and bank signatories.
- f) The Club will only use your personal information for the purposes for which the Club collected it, as set out above, unless the Club reasonably considers that the Club needs to use it for another reason and that reason is compatible with the original purpose. If the Club needs to use your personal information for an unrelated purpose, the Club will notify you and the Club will explain the legal basis which allows the Club to do so through modification of this policy.

3. How the Club collects your information

3.1 Directly from you, when you apply for membership, when you communicate with the Club by email or other method, or when you interact with the Club in various other ways such as signing up for coaching or taking part in an event.

3.2 From someone else who has applied for Membership on your behalf (for example a family Member or your tennis coach who has provided the Club with your contact details for that purpose).

3.3 From the LTA (for example, where the LTA passes on your details to the Club in connection with a query you have raised about the Club);

3.4 From Clubspark for Membership services including court bookings.

3.5 From you when provided through a WhatsApp Group used by the Club.

4. Sharing the data

4.1 Data is shared only where there is a need to share the data and only the data necessary is shared. For example relevant details are shared with Committee members when there is a need to carry out their role.

4.2 If contact details are to be visible to others, e.g. on the Members information leaflet, on the Club website, in a media article or shared with other Members (except through WhatsApp as described elsewhere in this policy), then permission should be sought from the Member first.

4.3 Members details are shared with the Club coach only if the Member has agreed to this.

4.4 Membership data may be provided to the LTA and Sportlabs for the purposes of providing Membership services.

4.5 The Privacy Policy for the operators of the Clubspark system (Sportslabs Technology Ltd) is available from the Club’s website, at the bottom of each page.

4.6 There will be occasions when the names of club members will be passed to third parties for the Club to deliver to Members the benefits of Membership. An example is; Players names being entered into the Shropshire League Competition Database.

4.7 Members signing up to Club activities may have their phone contact details shared with other Members also participating in the activity via a WhatsApp Group. The WhatsApp group description alerts Members to the fact that phone numbers are shared via the group and that Members are requested to leave the group if this is an issue.

4.8 There are certain exceptional circumstances in which the Club may disclose your information to third parties. This would be where the Club believes that the disclosure is:

- Required by the law, or in order to comply with judicial proceedings, court orders or legal or regulatory proceedings.
- Necessary to protect the safety of Members, Club property or the public.
- Necessary for the prevention or detection of crime.

5. How long do The Club keep your personal data?

5.1 The Club will keep your personal data only for as long as necessary for each purpose the Club uses it.

5.2 Membership data the Club will retain it for so long as you have a valid Membership or retain Club keys and for a period of six years after your last interaction with the Club (for accounting and record-keeping purposes).

5.3 Information provided through the Club website the Club will retain for a period of six years after your last interaction with the Club, subject to your right to have your information erased as outlined below.

5.4 Other data such as that relating to any reported accidents or safeguarding issues will be retained as long as necessary in order to be able to comply with legal obligations.

6. How the information is held

6.1 Forms are kept by a committee member and the Club will also maintain a confidential electronic database of Members, Open Day attendees and other Club contacts.

6.2 Contact email addresses will also be held as Contacts in the club email system together with contact email communications.

6.3 Members' details are stored on the Sportslabs Clubspark system.

6.4 A small number of Committee members will be provided with limited information from the database where required for the purposes of managing the Club. This will include the Chairperson, Membership Secretary, Treasurer and Team Captains.

7. How the Club protects your personal data

7.1 Personal information will not be passed on to any marketing companies or be used for any form of profit or gain.

7.2 The Club will not share your personal data with any third parties other than those specified in this policy without your prior consent (which you are free to withhold) except where required to do so by law.

7.3 The Club will take all steps reasonably necessary to ensure that your personal data is treated securely and in accordance with this policy.

7.4 The Club will notify you promptly in the event of any breach of your personal data which might expose you to serious risks.

7.5 Where you are transmitting information to the Club over the internet this cannot be guaranteed to be 100% secure. The Club uses Gmail for most email contact, with some emails sent through the Clubspark system.

7.6 If the Club in future uses online Membership services for payments the Club will use a recognised online secure payment system.

8. Viewing of Information held and your rights

8.1 Anyone whose details are held by the Club may ask the Club to show them the personal information held about them. If any information is incorrect then you must inform the Club so that the data can be amended.

8.2 You have the absolute right to withdraw consent where the Club processing is on the basis of consent.

8.3 You may request that your personal data is erased, in certain circumstances.

8.3 You have the right to object to or restrict how your personal data is processed,

8.4 Please note that the above rights are not absolute, and the Club may be entitled to refuse requests where exceptions apply.

8.5 You have the right to take any complaints about how the Club process your personal data to the information commissioner at www.ico.org.uk/concerns/

9. Contact and complaints

If you have any queries about this Privacy Policy or how the Club process your personal data, or if you wish to exercise any of your legal rights, please contact the Club.

If you are not satisfied with how the Club 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

10. Contact the Club

The Club contact details are as follows are:

Email: broseleytennisclub@gmail.com