

**What does this privacy policy cover?**

This privacy policy informs you regarding the use of your personal information which is collected when you join Cross in Hand Lawn Tennis Club (CIHLTC). It explains what personal data is processed, for which purposes, how long we hold the personal data for and the options you have regarding your personal data.

Collection of your personal information is solely as submitted to and maintained by you in the Clubspark system, which is provided and administered by the LTA on behalf of registered clubs. Each Member or group of Members (families or partners) submits or confirms their personal details at least annually at the start of their Membership of CIHLTC. In addition, bank details may be requested for the specific purpose of making payments to Members. The Club does not further supplement your information without prior agreement.

Your privacy matters to us so please familiarise yourself with this privacy policy and contact the CIHLTC Committee if you have any questions or queries.

**Who is responsible for the personal information collected?**

Your personal data is controlled by CIHLTC, as represented by the Committee.

**How do we use your personal information?**

The information is used by the Committee as a record of your Membership, in the Clubspark system.

A list of Members' names and contact numbers are published on the Club noticeboard to encourage inter-membership contact. We do not publish e-mail addresses or contact numbers for Juniors i.e. those aged 18 and under. Images of Club Members may also be used on social media where appropriate for Club publicity and as part of Members' social media interactions with each other and with the Club.

The principal method of communication used by CIHLTC is e-mail, as provided by Members into Clubspark. Every attempt is made to address communications to those groups, Adults or Juniors or both, to which it applies. For example, e-mails related to social activities and tournaments will be typically be sent only to Adults or only to Juniors. We will seek to ensure that all group communications have the recipient details anonymised.

Those members that wish to minimise the amount of communication that they receive from the Club can do so in Clubspark, and hence forth will only receive the communication that it is in their legitimate interest to receive i.e. matters relating to their Membership of the Club and the availability of Club facilities.

**Transfers of personal data**

Your personal data will only be transferred to the following named third parties and for the purposes stated –

- Elevate Tennis Coaching (Elevate), who are contracted to run the coaching programmes for CIHLTC. Elevate will always provide you with the opportunity to opt out of their communications.
- British Tennis/LTA, to identify Members who are aligned to the Club.

We will not disclose any personally identifiable information without your permission unless we are legally entitled or required to do so, for example for the purposes of prevention of fraud or other crime, or if we believe that such action is necessary to protect and/or defend the rights of CIHLTC, its property or the personal safety of the Committee, our Members or other individuals.

**For how long do we retain your personal data?**

It is the responsibility of Members to maintain their details and Membership in Clubspark, including removing them if they subsequently cease membership of CIHLTC. The Club will retain personal information only for the period of time necessary for managing your Membership or renewal of that membership, and we commit to cease communication with you regarding renewal of your Membership no later than 3 months after its expiry.

Where it is under the control of the Club to do so, personal data relating to a specific Membership year shall be deleted or fully anonymised no later than 9 months after the end of that Membership year, thus allowing for Club accounts to be professionally audited at the end of the period. Personal data held for the specific purposes of maintaining the Club's accounting records (i.e. details of Members' subs paid) is retained for 6 years from the end of the accounting period involved, in line with that required for the Club's accounting books and records.

Bank account details which have been requested for the specific purpose of making payments to Members and are then held securely with our bank, currently the Charities Aid Foundation Bank, will be deleted when a Member leaves the Club.

### **Security of your personal data**

The Committee have implemented technology and policies with the objective of protecting your personal information from unauthorised access and improper use, including being stored on a market standard software and hosting e.g. Dropbox, Quickbooks, Clubspark, and access being restricted to the Committee.

Where payments are made by the Club to Members e.g. 100-Club winnings, subs reimbursements, etc., bank account details are collected and held securely with our bank, currently the Charities Aid Foundation Bank.

### **Cookies policy**

The term “cookies” refers to a small piece of data that a website asks your browser to store on your computer or mobile device, thus allowing the website to “remember” your actions or preferences over time. The Club does not currently employ cookies, or other similar technologies, to collect information about you or your preferences, or allow 3<sup>rd</sup> parties to do so.

### **Special Notice – Processing children’s personal data**

Definitions of Juniors for the purposes of the Club Membership is those individuals aged 18 and under.

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### **Your rights - Right of access, rectification, erasure and data portability**

You have the right to obtain access to your personal data or request us to rectify it. We will also provide you with information about the purposes of processing your data, the information we process for such purposes, the recipients to whom we have disclosed your personal data and the criteria used for determining the period for which your personal data will be held by us.

You are also entitled to request that we erase your personal data and we will comply with such request without undue delay. In the event we cannot comply with your request, for instance as it relates to your Membership of the Club, you can request a restriction of the processing of that data – in such case we will only hold and process your personal information for the purposes for which we have agreed.

You have the right to receive personal data that concerns you and which you have provided to the Club, in a structured, digital form and transmit such data to another party, if this is technically feasible.

### **Right to lodge a complaint**

If you have any issues, queries or complaints regarding the processing of your personal data, please contact the CIHLTC Chairman. You also have the right to lodge a complaint with the supervisory data protection authority in the UK, The Information Commissioner’s Office (ICO).

### **If you communicate with us through social media**

If you choose to interact with the Club services such as our Website or content through social media such as LinkedIn, Facebook and/or Twitter, your personal data (such as your name and the fact that you are interested in the Club) will also be visible to all the visitors of your personal page, according to your privacy settings on those social media services. In this case, only the terms and conditions (including the privacy policy) of the social media website apply. The Club is not responsible for the processing of personal data or the privacy policy of such social media websites, and the Club’s Privacy Policy is therefore not applicable.

When you communicate with us through our Facebook page (for example, when you post a comment, upload media, send a personal message or become a fan of us by clicking the “Like” button, we may receive personal data about you (such as your (user) name, profile photo, your hometown, your email address and your gender). How we use your personal data, is described in the applicable Facebook Privacy Policy, which applies in addition to (i) this Privacy Policy and (ii) the terms of use and other statements from Facebook. Such terms of use and other statements may differ from this Privacy Policy.

### **Changes to this Privacy Policy**

This Privacy Policy may be changed over time. You are advised to regularly review the Privacy Policy for possible changes but if the changes are significant, we will inform you.