

## PRIVACY POLICY

### 1. Introduction

- 1.1 We are committed to safeguarding the privacy of our website visitors and service users; in this policy we explain how we will handle your personal data.
- 1.2 We are a tennis club whose officers and staff consist only of volunteers. We have established a website for the use and benefit for the members for the time being of the tennis club using the model provided by the Lawn Tennis Association (LTA) for tennis clubs under the brand ClubSpark.
- 1.3 Our website is provided by Sportlabs Technology Ltd t/a ClubSpark ("ClubSpark") and as our provider they may use cookies to cookies to administer some of the services relating to your account
- 1.4 Details of the ClubSpark privacy policy can be found here:  
<https://clubspark.lta.org.uk/MidhurstTennisClub/PrivacyPolicy>
- 1.5 Under law we as owners of the website are also obliged to have a privacy policy and to inform you that we may through our use of the Clubspark model use cookies to administer some of the services and other functions relating to your account with us
- 1.6 We have decided for the purposes of our policy to incorporate herein the terms and conditions of the ClubSpark policy as though they were repeated herein and references to ClubSpark in that policy shall be treated as references to us herein
- 1.7 You should therefore read the terms of that policy carefully as it applies to you directly
- 1.8 Therefore by using our website, you consent to the use by us and them of cookies in accordance with this policy incorporating their policy
- 1.9 Our website incorporates privacy controls which affect how we will process your personal data. By using the privacy controls, you can specify whether you would like to receive direct marketing communications and limit the publication of your information. You can access the privacy controls via our website
- 1.10 The remainder of this policy sets out some generic powers, authorities and consents that we are advised are relevant to the way that websites of this sort are operated and are required to be included in a policy of this sort to meet our obligations under law

### 2. How your personal data may be used

- 2.1 In this Section 2 we have set out:
  - a) the general categories of personal data that we may process;
  - b) in the case of personal data that we did not obtain directly from you, the source and specific categories of that data;
  - c) the purposes for which we may process personal data; and
  - d) the legal bases of the processing.
- 2.2 We may process data about your use of our website and services ("usage data"). The usage data may include your IP address, geographical location, browser type and version, operating

system, referral source, length of visit, page views and website navigation paths, as well as information about the timing, frequency and pattern of your service use. The source of the usage data is our analytics tracking system. This usage data may be processed for the purposes of analysing the use of the website and services. The legal basis for this processing is consent

- 2.3 We may process your account data ("account data"). The account data may include your name and email address. The source of the account data is you. The account data may be processed for the purposes of operating our website, providing our services, ensuring the security of our website and services, maintaining back-ups of our databases and communicating with you. The legal basis for this processing is consent.
- 2.4 We may process your information included in your personal profile on our website ("profile data"). The profile data may include your name, address, telephone number, email address, gender and date of birth. The profile data may be processed for the purposes of enabling and monitoring your use of our website and services. The legal basis for this processing is consent.
- 2.5 We may process your personal data that are provided in the course of the use of our services ("service data"). The source of the service data is you. The service data may be processed for the purposes of operating our website, providing our services, ensuring the security of our website and services, maintaining back-ups of our databases and communicating with you. The legal basis for this processing is consent.
- 2.6 We may process information that you post for publication on our website or through our services ("publication data"). The publication data may be processed for the purposes of enabling such publication and administering our website and services. The legal basis for this processing is consent.
- 2.7 We may process information relating to transactions, including purchases of goods and services, that you enter into with us and/or through our website ("transaction data"). The transaction data may include your contact details, your card details and the transaction details. The transaction data may be processed for the purpose of supplying the purchased goods and services and keeping proper records of those transactions. The legal basis for this processing is the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract and our legitimate interests, namely our interest in the proper administration of our website and business.
- 2.8 We may process information that you provide to us for the purpose of subscribing to our email notifications and/or newsletters ("notification data"). The notification data may be processed for the purposes of sending you the relevant notifications and/or newsletters. The legal basis for this processing is consent.

2.9 Please do not supply any other person's personal data to us, unless we prompt you to do so.

### **3. Providing your personal data to others**

- 3.1 We may disclose your personal data to ClubSpark insofar as reasonably necessary for the operation of this website and the purposes set out in this policy.
- 3.2 We may disclose your personal data to our insurers and/or professional advisers insofar as reasonably necessary for the purposes of obtaining and maintaining insurance coverage, managing risks, obtaining professional advice and managing legal disputes.
- 3.3 Financial transactions relating to our website and services may be handled by our payment services providers, Stripe. We will share transaction data with our payment services providers

only to the extent necessary for the purposes of processing your payments, refunding such payments and dealing with complaints and queries relating to such payments and refunds. You can find information about the payment services providers' privacy policies and practices at [www.stripe.com](http://www.stripe.com).

- 3.4 In addition to the specific disclosures of personal data set out in this Section 3, we may also disclose your personal data where such disclosure is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.

## 4. Retaining and deleting personal data

- 4.1 This Section 5 sets out our data retention policies and procedure, which are designed to help ensure that we comply with our legal obligations in relation to the retention and deletion of personal data.
- 4.2 Personal data that we process for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.
- 4.3 Your personal data will be retained for a year following resignation, at the end of which period it will be deleted from our systems
- 4.4 In some cases it is not possible for us to specify in advance the periods for which your personal data will be retained. In such cases, we will determine the period of retention based on the circumstances leaving the club
- 4.5 Notwithstanding the other provisions of this Section 4, we may retain your personal data where such retention is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.

## 5. Amendments

- 5.1 We may update this policy from time to time by publishing a new version on our website.
- 5.2 You should check this page occasionally to ensure you are happy with any changes to this policy.
- 5.3 We may notify you of changes to this policy by email

## 6. Your rights

- 6.1 You may instruct us to provide you with any personal information we hold about you; provision of such information will be subject to:
- a) the payment of a fee (currently fixed at £10); and
  - b) the supply of appropriate evidence of your identity (for this purpose, we will usually accept a photocopy of your passport certified by a solicitor or bank plus an original copy of a utility bill showing your current address)
- 6.2 We may withhold personal information that you request to the extent permitted by law.
- 6.3 You may instruct us at any time not to process your personal information for marketing purposes.
- 6.4 In practice, you will usually either expressly agree in advance to our use of your personal information for marketing purposes, or we will provide you with an opportunity to opt out of the use of your personal information for marketing purposes.

## 7. About cookies

- 7.1 A cookie is a file containing an identifier (a string of letters and numbers) that is sent by a web server to a web browser and is stored by the browser. The identifier is then sent back to the server each time the browser requests a page from the server.
- 7.2

- 7.3 Cookies may be either "persistent" cookies or "session" cookies: a persistent cookie will be stored by a web browser and will remain valid until its setexpiry date, unless deleted by the user before the expiry date; a session cookie, on the other hand, will expire at the end of the user session, when the web browser is closed.
- 7.4 Cookies do not typically contain any information that personally identifies a user, but personal information that we store about you may be linked to the information stored in and obtained from cookies.

## 8. Cookies that may be used

- 8.1 We and/or ClubSpark use cookies for the following purposes:
- (a) authentication - to identify you when you visit our website and as you navigate our website;
  - (b) status - to help us to determine if you are logged into our website;
  - (c) personalisation - to store information about your preferences and to personalise the website for you;
  - (d) security - as an element of the security measures used to protect user accounts, including preventing fraudulent use of login credentials, and to protect our website and services generally;
  - (e) analysis - to help us to analyse the use and performance of our website and services.

## 9. Cookies used by our service providers

- 9.1 Our service providers use cookies and those cookies may be stored on your computer when you visit our website.
- 9.2 Google Analytics may be used to analyse the use of our website. Google Analytics gathers information about website use by means of cookies. The information gathered relating to our website may be used to create reports about the use of our website. Google's privacy policy is available at: <https://www.google.com/policies/privacy/>
- 9.3 As described above, ClubSpark may use cookies to administer some of the services relating to your account.

## 10. Managing cookies

- 10.1 Most browsers allow you to refuse to accept cookies and to delete cookies. The methods for doing so vary from browser to browser, and from version to version. You can however obtain up-to-date information about blocking and deleting cookies via these links:
- (a) <https://support.google.com/chrome/answer/95647?hl=en> (Chrome);
  - (b) <https://support.mozilla.org/en-US/kb/enable-and-disable-cookieswebsitepreferences> (Firefox);
  - (c) <http://www.opera.com/help/tutorials/security/cookies/> (Opera);
  - (d) <https://support.microsoft.com/en-gb/help/17442/windows-internetexplorerdelete-manage-cookies> (Internet Explorer);
  - (e) <https://support.apple.com/kb/PH21411> (Safari); and
  - (f) <https://privacy.microsoft.com/en-us/windows-10-microsoft-edge-andprivacy> (Edge).
- 10.2 Blocking all cookies will have a negative impact upon the usability of many websites.
- 10.3 If you block cookies, you will not be able to use all the features on our website.

## 11. Our details

- 11.1 This website is owned and operated by Fernhurst Tennis Club.
- 11.2 Our principal place of business is:

Fernhurst Recreation Ground,  
Fernhurst  
West Sussex  
GU27 3HY

- 11.3 You can contact us by email, using the email addresses published on our website Contact page.
- 11.4 The Chair of our Club from time to time and for the time being is our Data Protection Officer (contact details can be found on our website)

This policy is reviewed every three years (or earlier if there is a change in national legislation).

Chair: Peter Rix Date: 24/04/2023

Welfare Officer: Chris Taylor Date: 24/04/2023

Review date: 24/04/2026