# **Shillingstone Tennis Club**

# **Privacy Policy**

This Policy sets out the way in which Shillingstone Tennis Club collects and uses your data as a member of the Club.

Shillingstone Tennis Club needs to collect and use certain types of data in order to carry out the business of the Club. This personal information will be collected and dealt with in accordance with GDPR. For the purposes of GDPR, Shillingstone Tennis Club is the Data Controller for all information held.

The General Data Protection Regulations (GDPR) May 2018 is a legal framework that sets guidelines for the collection and processing of personal information from individuals.

## **Data Protection Principles**

Anyone processing personal data must comply with the following principles. Data shall be:

- 1. Processed fairly, lawfully and transparently.
- 2. Collected for specified, explicit and legitimate purposes.
- 3. Adequate, relevant and not excessive for the purpose.
- 4. Accurate and where necessary, kept up to date.
- 5. Not kept for longer than necessary for the purpose.
- 6. Processed in line with data subjects' rights.
- 7. Secure.

## Where we Collect and Store your Data

We use the LTA-approved ClubSpark system as the primary platform on which we collect and store your personal information. The Privacy Policy for ClubSpark can be found at the bottom of each page of the Club website.

Some of this information may be extracted for the purposes of managing the membership only; and may be held on computers, laptops, mobile devices, or in a manual file.

## Types of Data we Collect

To provide our services we collect the following information on members through ClubSpark:

- Name
- Gender
- Date of birth
- Contact details (including address, phone number/s, email)
- British Tennis number
- Date of joining
- Membership type
- Payment confirmation

For junior members participating in the club coaching sessions, we also collect their parent/carer/emergency contact details and medical/disability history via a consent form.

Members have the option to opt in to receiving emails regarding club news, league/matchplay, coaching and inclusion in the Register of Members.

The ClubSpark booking system collects the names of all players (members and non-members) when a court is booked.

Photo and filming may only be taken of members with their prior consent, and may only be used for the agreed purposes. The consent of the parent/guardian will be obtained for any junior members under the age of 13 years (see further information on consent see below). Access to Personal Data

Date Reviewed: October 2023 Next Review: October 2024 (or earlier if there is a change in legislation)

Only committee members who need to have access to personal information for the purposes of administering the club activities will be granted administration rights to ClubSpark. This may be short-term access if for a specific task. Access will be managed by the Treasurer & Membership Secretary, and authorised by the Chairman. These Committee members have responsibility for processing and using personal information in accordance with GDPR.

The Club coach has access to the Junior Coaching Consent Forms in order to run sessions safely.

## How we use your data

We will only process personal data for the following specific purposes:

- 1. For the administration and processing of your membership.
- For Shillingstone Tennis Club communications including activities and services that may be of interest to you (e.g. social events, coaching, membership, club news and other events.
- 3. Promoting Shillingstone Tennis Clubs goods and services of third parties including coaching courses and events, where we think this will be of interest to you/a membership list where consent has been given by you to display contact information to other members for example to arrange a booking.

## The legal basis for processing your personal data

- 1. Contract we process your personal data because it is necessary for the performance of a contract to which you are a party.
- 2. Legitimate Interests we process your personal data because it is necessary for our legitimate interests such as running the club in a professional manner.
- 3. Legal Obligations we also process your personal data for our compliance with our legal obligations, for example tax law and accounting purposes, child welfare, health and safety and the prevention and detection of crime carried out by the Police and other competent authorities.
- 4. Special Categories of Data we will process special categories of personal data (such as data concerning health) where this has been provided by directly by you.

## Sharing your information with others

We will not disclose or share any personal information with any third party outside the Club, unless we are under a legal obligation to do so OR you have given the club consent to do so.

Members have the option to share their information with the LTA, for the purposes of their involvement in British Tennis, through opting in on ClubSpark.

#### How long is your information is kept for?

We will not keep personal data longer than is necessary for the purpose or purposes for which they were collected. We will take all reasonable steps to destroy, or erase from our systems, all data that is no longer required.

Children's Coaching Consent Forms are kept by the coach and securely destroyed at the end of the set of coaching sessions they relate to.

Membership information is deleted by the Treasurer & Membership Secretary if a person/s cease to be a member for any reason, and if a member fails to renew their membership one month after the renewal date. Data retained for the purposes of administering Pay and Play will be deleted periodically.

Safeguarding correspondence kept by the Welfare Officer will be securely destroyed once the enquiry has been concluded.

Accounts are kept by the Treasurer & Membership Secretary for six years from the end of the last financial year they relate to. For years prior to this just the Summary of Accounts sheet is kept and all other data is securely destroyed.

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#### Consent

Where we are relying on consent as a means to process Personal Data, the member who gave the consent can withdraw it at any time. Please be aware however that we may have another lawful reason to process the Personal Data in question even without your consent. That reason will usually have been asserted under this Privacy Policy.

Junior members 13 years and over are deemed to be of sufficient maturity and understanding to provide their own consent (unless there is a good reason, or it would be inappropriate to request their consent).

## Members Rights

Members have the following rights under GDPR in relation to their personal data:

- 1. To be informed of how your data is collected and processed through the details contained within this Privacy Policy
- 2. Of access to your personal data the right to request copies of personal data we hold about you.
- 3. To rectification of your personal data the right to have your data rectified if it is inaccurate or incomplete (subject to limitations).
- 4. To have personal data erased in certain circumstances the right to request that we delete or remove your data from our system (subject to limitations)
- 5. To restrict processing in certain circumstances the right to request that we stop processing your data or limit is being used in a certain way (subject to limitations)
- 6. To data portability the right to request that we move, copy or transfer your data.
- 7. To object to or restrict how their personal data is used in certain circumstances

Should a member wish to exercise any of these rights, they are requested to please contact the Chairman/Welfare Officer.

Where we are legally permitted to do so for example, where requests are subject to certain legal limitations, we may refuse your request. If we refuse your request we will tell you and give reasons why.

# Keeping data secure

Shillingstone Tennis Club will take all reasonable technical and organisational measures to safeguard the personal data that it holds. If you suspect any misuse, loss or unauthorised access to your data, please contact us immediately using the contact details listed below.

#### Changes to this Privacy Policy

Shillingstone Tennis Club reserves the right to update this Policy, as we deem necessary. Any changes to this Policy will be updated on the website.

#### **Contact and Complaints**

If you have any queries regarding this Privacy Policy or how we handle your personal information please contact the club through the Contacts section of the Website.

If you are not satisfied with the way a complaint in relation to your data is handled by Shillingstone Tennis Club, you can refer your complaint to the Information Commissioners Office (ICO). https://ico.org.uk/