

## **SHTC- General Data Protection Regulation Policy 2018**

This policy is in place to formalise SHTC's compliance with the requirements of the EU General Data Protection Regulation (GDPR) in order to make members of SHTC aware of how we use members data.

### **How we collect information at SHTC**

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

- Directly from you, when you make enquiries on our website, when you provide information via the Venue's club management software (Club spark) or court booking system, or when you interact with us during your time as a member in various other ways (for example, where you enter a competition, renew your membership, sign up for a course or lessons);
- From someone else who has applied for membership on your behalf (for example a family member or your tennis coach who has provided us with your contact details for that purpose);
- 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 our 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);
- Financial information, including Direct Debit details;
- Certain other information which you volunteer when making use of your membership benefits (for example, when making court bookings or making use of other Venue facilities).

We may also collect data about your health or medical conditions, where you have volunteered this, for example so that we can cater for you when you attend a Venue social event or a course/camp.

### **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 your Venue membership, including:
  - informing you about court / facilities opening hours;
  - taking payment of membership fees;
- Fulfilment of orders for goods and services, including court bookings;
- Administration of the Wimbledon ballot;

where this is necessary for the performance of a contract (including any written terms and conditions relating to your membership) with you;

- Research and statistical analysis about who is playing tennis in our Venue;
- Communication about our Venue activities that we think may be of interest to you;
- Storing your details on the software platform we use for our online member database. Please note that your own use of the software or system is subject to the Terms and Conditions and Privacy Policy published on that site;

where this is necessary for our legitimate interests (for example in increasing use of our Venue's facilities and participation in the game generally);

- Promoting our Venue and promoting goods and services of third parties (for example, equipment suppliers, operators of coaching courses, and organisers of tennis events) 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.

### **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 regardless of your marketing preferences in order for us to fulfil our contractual obligations to you as a member of our Venue. Examples of these essential service communications are:

- Records of transactions, such as payment receipts or Direct Debit confirmations (as applicable).
- Membership related mailings such as your membership renewal reminder, notices of formal meetings and information about venue closures and holiday opening hours.

You are in control of how we communicate with you. You can update your choices and/or your contact details by contacting us at:

Telephone: 020 8459 2348

Email: [info@southhampsteadtennis.net](mailto:info@southhampsteadtennis.net)

Post: 1 Milverton Road. Brondesbury Park. London. NW6 7AR

### **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 employees and volunteers, for the purposes of administering your membership and giving you access to the membership benefits to which you are entitled.
- Our contractors and suppliers, including coaches.

### **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 membership data, this means we retain it for so long as you have a valid venue membership and 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 Desi Lodge Patch

By email [info@southhampsteadtennis.net](mailto:info@southhampsteadtennis.net)

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](http://www.ico.org.uk).

### New requirements in order to comply with GDPR

- SHTC is required to name a data controller<sup>1</sup>- this person will be **Ibrahim Solak**.

**Eight principles under which data controllers must process data.** These state that personal data must be:

- Processed fairly and lawfully;
- Obtained only for one or more specified and lawful purposes, and shall not be further processed in any manner incompatible with that purpose or those purposes;
- Adequate, relevant and not excessive in relation to the purpose or purposes for which they are processed;
- Accurate and, where necessary, kept up to date;
- Processed in accordance with the rights of data subjects under the Act.
- Personal data processed for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes;
- Appropriate technical and organisational measures shall be taken against unauthorised or unlawful processing of personal data and against accidental loss or destruction of, or damage to, personal data;
- Personal data shall not be transferred to a country or territory outside the European Economic Area

What data SHTC collects	Why	How is the data used
Name	To know who you are	Shared with team captains and coaches with member agreement
Address	To know where you live	Only used by team captain if in a team so that lifts can be organised.
Email address	The primary means of communication with members	To make members aware of membership renewals and team details if members are in a team. Members can request not to be informed of any other club activity, but SHTC also email about: club competitions, tournaments, Wimbledon ticket draw, social events.
Phone numbers	So that SHTC can contact you if there are problems with your email, or you are in a team	Only used for team captain or coach so that relevant information can be shared.
Your BTM number and Opt-In status	To know if members are eligible for the club's Wimbledon ticket draw	Needed by team captains if members play in a team.

Your date of birth	To know your age if you are applying for a Concession, or Junior membership	To determine if members are over 11 and eligible for a Wimbledon ticket draw.
Photographs on website	To promote tennis at SHTC	Consent from members will enable photographs to be posted.

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<sup>1</sup>responsible for determining the purposes for which and manner in which data is processed