

WEST MERSEA TENNIS AND CROQUET CLUB DATA PRIVACY AND PROTECTION POLICY (GDPR 2018)

Introduction

This is the Data Privacy and Protection Policy (GDPR 2018) for West Mersea Tennis and Croquet Club hereinafter referred to as the "Club".

The Club is committed to complying with data protection laws and in respecting the privacy rights of individuals. The Data Privacy and Protection Policy applies to all of our members

This Data Privacy and Protection Policy (hereinafter referred to as "Policy") sets out our approach to data protection law and the principles that the Club will apply to its processing of personal data. The aim of this Policy is to ensure that the Club processes personal data in accordance with the law and with the utmost care and respect.

The Club is not required to appoint a Data Protection Officer (DPO), However it must appoint one or several members to be responsible for overseeing its compliance with data protection laws. The Club has decided to appoint the Committee.

In addition, all members are individually responsible for data protection, and each person has their role to play to make sure the Club is compliant with data protection laws.

All members should be aware that there are serious consequences if the Club does not comply with data protection laws and these include substantial fines.

Personal data is described as data that relates to a living individual member who can be identified from that data (or from that data and other information in or likely to come into the Club's possession). That personal data might be written, oral or visual (e.g. but not limited to, photograph or CCTV). In general terms personal data will be retained as necessary in performing the Club's contract with the member and for the purpose of pursuing legitimate interests in operating the Club or by individual consent, however, in special circumstances permission to use the personal data might have been obtained as a result of historical usage or orally but in either of these two latter cases permission must be unequivocal (and members should see under "Your Rights")

1. About our Policy

- a. This policy explains when and why the Club collect personal information about our members (and visitors if applicable), how the Club uses it and how the Club keeps it secure and your rights as members in relation to it.
- b. The Club may collect, use and store members' personal data, as described in this Data Privacy and Protection Policy and as described when the Club collects data from them either at the time of applying for membership or at subsequent renewal of membership. The Club may also collect data from a member when entering for competitions or other special events.
- c. The Club reserves the right to amend this Data Privacy and Protection Policy from time to time without prior notice. Members are advised to check the Club noticeboard or our website (www.clubspark.lta.org.uk/WestMerseaTennisClub) regularly for any amendments, but these will not be made retrospectively.
- d. The Club will always make every effort to comply with the General Data Protection Regulation (**GDPR**) when dealing with members' personal data. Further details on the GDPR can be found at the website for the Information Commissioner (www.ico.gov.uk). For the purposes of the GDPR, the Committee will be the "controller" of all personal data the Club holds about members.

2. What information the Club collects and why.

| Type of information | Purpose | Legal basis of processing |
|---|--|--|
| Member's name, address, telephone number, e-mail address, and membership class | Managing and enhancing the functionality of a member's membership of the Club and its activities | Performing the Club's contract with the member and for the purpose of pursuing legitimate interests in operating the Club. |
| Member's name and telephone number displayed in the Club | For contact purposes by other members | Performing the Club's contract with the member and for the purpose of pursuing legitimate interests in operating the Club. Historical Usage |
| Name, email address and telephone number of Club Officers and other members where necessary and displayed on the Club's website | For contact purposes by other members | Performing the Club's contract with the member and for the purpose of pursuing legitimate interests in operating the Club. Historical Usage |
| Gender and Age | Provision of adequate facilities for members | For the purpose of the Club's legitimate interests in ensuring that sufficient and suitable facilities are provided for each gender and age group |
| Achievement data both current and historical | To provide information as to the results of competitions and matches and acknowledgement of other achievements | For the purpose of the Club's legitimate interest in the operation of the Club and the sport of the Club by member's consent where appropriate and individually provided. |
| Photographic and video records | For members' information and used to promote the Club's activities and preserve its history | By member's consent where appropriate and individually provided. |
| CCTV Footage | For protection of the Club's members and/or assets | For the legitimate purpose of protecting the Club's members and/or assets. |
| Match fixtures and team lists | For members' information | By member's consent and individually provided. |
| External Organisations | Reporting and providing information to the sport's controlling bodies, national, regional and local | By member's consent and for the legitimate interests in the organisation of the sport of Tennis or Croquet but the Club to take reasonable steps in ensuring all such bodies have their own GDMR Policy in place |
| Legal information on personal data | | As may be required by the Law from time to time |

Note 1: Where the above affects children and/or junior members consent for the obtaining and retention of all information must be obtained from their parent or legal guardian. In accordance with the guidelines as issued by the United Nations, “children” are persons under the age of 18 years.

Note 2: Where the above affects vulnerable adults, who are not capable of understanding the full implications of the above, consent must be obtained from their legal guardian or where power of attorney exists from one of the persons who holds the appropriate power of attorney.

Note 3: If the above affects visitors the Club will take all reasonable steps to obtain verbal acceptance.

Note 4: Where personal data including photographic images is displayed on the Club’s web site this will only be with the member’s prior consent.

3. How we protect your personal data

- a. The Club has implemented generally accepted standards of technology and operational security in order to protect personal data from loss, misuse, or unauthorised alteration or destruction, full details are available on request. Members must accept this security cannot be applied to data displayed in the Club but members have the right to ask for their personal data not to be included in these cases.
- b. The Club will use best endeavours to contact a member promptly if and once it becomes aware of any breach of the member’s personal data.
- c. Where personal data is provided between players in respect of team activities the Club will ask those members to use due diligence in protecting the member’s information.

4. Who else has access to the information you provide us?

- a) The Club will never sell a member’s personal data. The Club will not share members’ data with third parties except as below and with your prior consent or where we are required to do so by law.
- b) The Club will pass member’s information to the sport’s controlling bodies, national, regional and local with the member(s) prior consent provided the Club takes reasonable steps in ensuring all such bodies have their own GDPR Policy in place. Members must accept that when entering competitions their information will be passed to other entrants or displayed on the appropriate web site.
- c) The Club may pass a member’s achievement data or photographic images to the press where it is of benefit to the Club or the sport of Tennis or Croquet provided we have your prior consent. Members’ achievements may be on display in the Club including photographs provided the member, where possible, has given his or her consent.

5. How long do we keep your information

- 1) The Club will hold a member’s personal data on its systems for as long as they are members of the Club and for as long afterwards as it is in the Clubs’ legitimate interest to do so or for as long as is necessary to comply with our legal obligations. The Club will review members’ personal data every year to establish whether it is still entitled to process it. If the Club decides that it is not entitled to do so, it will stop processing a member’s personal data except that it may retain the personal data in an archived form in order to be able to comply with future legal obligations for example, but not by limitation, exercise or defence of legal claims.

- 2) If a member has to provide the Club with any financial information the Club will securely destroy it once the Club has used it and no longer has need of it.

6. Your Rights

A member has rights under the GDPR:

1. To access their personal data
2. To be provided with information about how their personal data is processed
3. To have their personal data rectified
4. To have their personal data erased in certain circumstances
5. To object to or restrict how their personal data is processed

7. Complaints

Complaints as to how the Club processes a member's personal data should be addressed in the first instance to the Chairman of the Committee at the Club who will try and resolve any problems they may have. If the member is still dissatisfied by his or her response, they have the right to take any complaints about how the Club processes their personal data to the Information Commissioner:

<https://ico.org.uk/concerns/>

0303 123 1113.

Information Commissioner's Office

Wycliffe House
Water Lane
Wilmslow
Cheshire SK9 5AF

8. Obtaining further information on the Club's Data Privacy Policy

If you require more details, please address any questions, comments and requests regarding the Club's data processing practices to the Club Chairman who will refer it to the Committee.