

Data Protection Policy

Westhill Tennis Club

Modification	Date
Created by Harriet Broomfield	16/05/2018

Introduction

Westhill Tennis Club needs to gather and use certain information about individuals. These can include members, customers, coaches and other people the Club has a relationship with or may need to contact. This policy describes how this personal data must be collected, handled and stored to comply with the law. This policy and the procedures described within will be reviewed on an annual basis and any issues arising will be brought to the attention of the Club's committee.

Why this policy exists

This data protection policy ensures Westhill Tennis Club:

- Complies with data protection law and follows good practice
- Protects the rights of our members, volunteers, customers and partners
- Is open about how it stores and processes individuals' data
- Protects itself from the risks of a data breach

Data protection law

The General Data Protection Regulation (GDPR) 2018 describes how organisations must collect, handle and store personal information. These rules apply regardless of whether data is stored electronically, on paper or on other materials. To comply with the law, personal information must be collected and used fairly, stored safely and not disclosed unlawfully.

The GDPR is underpinned by 6 principles. These say that personal data:

- shall be used lawfully, fairly, and in a transparent manner in relation to individuals
- shall be collected for specified, explicit and legitimate purposes
- shall be adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed
- shall be accurate and, where necessary, kept up to date
- shall be kept in a form that permits identification or data subjects for no longer than is necessary
- shall be processed in a manner that ensures appropriate security of the personal data

Data protection manager

The data protection manager is the point of contact for all data protection issues. They are responsible for periodically reviewing the data protection policy and procedures, monitoring compliance with data protection law, considering data protection concerns during new club

activities and providing training on handling personal data. Past versions of this policy and privacy statements, training etc must be retained. They will also review the results of the Privacy Impact Assessment periodically to ensure the data types, processing and privacy risks are up-to-date.

The data protection manager is: Harriet Broomfield

They can be contacted at: westhilltennisclub@outlook.com

Data types and processing

Data is collected from both members and non-members for the purposes of membership, Open Day registration and court bookings. The legal basis for the collection of this personal information is detailed in the privacy statement section of this document.

Data type	Type of individuals	Purpose
First and last name	Members and non-members	Membership application, open day registration, court bookings
Date of birth	Members and non-members	Membership application, open day registration, court bookings
Gender	Members and non-members	Membership application, open day registration, court bookings
Email address	Members and non-members	Membership application, open day registration, court bookings
Phone numbers	Members and non-members	Membership application, open day registration, court bookings
Address	Members and non-members	Membership application, open day registration, court bookings
Emergency contact name and number	Members and non-members	Membership application, court bookings
British Tennis number	Members	Membership application
Payment information	Members and non-members	Membership application, court bookings
Student status	Members	Membership application

For members under the age of 18 the following data are collected for the parent/guardian rather than the child member: email, phone numbers

Payment information is collected by ClubSpark and processed by Stripe or GoCardless and is not actually visible to the Club's ClubSpark admin site.

This data is processed in the following ways:

1. Eligibility: Check eligibility for membership package and league teams.
2. Contact and membership processing: Pass on club information (code for court access, club activities and events, success in Wimbledon Ballot) and chase membership payments, deliver membership cards.
3. NESLTA league teams and social league teams: contact details are passed to the team captains to ascertain interest of members in joining the team and to facilitate organising

match schedules. Phone numbers for the ladies teams are shared on a WhatsApp group. League team members must be British Tennis members and have a British Tennis number.

4. Social tennis club nights: Email addresses are shared on an email list to put members in contact with each other to ascertain interest in attending club night sessions each week.
5. NESLTA team captains: contact details for our team captains are shared with NESLTA for distribution to other clubs to arrange matches.
6. LTA: Members can be registered with the LTA and indicate that they are members of our club. The LTA send us a list of people registered with them who have indicated they are affiliated with our club. Opting in to the Wimbledon Ballot is done through the LTA website by individuals where they are eligible. We share the names of Ballot winners with the LTA so the LTA can contact them for payment. Email addresses can be shared with the LTA so that instructions are sent describing how to become affiliated with the club and opt in to the ballot.
7. Coaching: A list of junior and mini members is sent to the coach (self-employed) on a periodic (monthly) basis as members are eligible to a discount on the coaching programme.
8. Reporting to governing bodies: Number of members by age and gender are shared with LTA and Sport Scotland for monitoring purposes.
9. Committee members: Email addresses of committee members are shared to arrange meetings and discuss club issues. Contact details for specific roles (Welfare Officer, Data Protection Officer) are published in the public domain to enable people to get in contact.
10. Booking: Names, addresses and email addresses are used to send booking confirmation and in case of issues with the booking or during play. Payment information is used for non-members to pay court fees.
11. Open Day: Names and addresses are used to send prospective members information they have requested. Those registering for the event online can sign up for specific activities they are eligible for.
12. Events: contact details are used to provide information on club events and emergency contacts are used if needed.

Data storage, security and access control

Personal data is stored primarily on ClubSpark (a cloud based server provider provided by SportsLabs for the LTA) and is encrypted. Access to data on ClubSpark is password protected and can be restricted – access can be granted for certain modules within ClubSpark, for example, access to booking information but not contact information. Personal data may also be found on Microsoft Outlook and OneDrive for email and club documents which is encrypted with password protected access. Written agreements with third party processors will be obtained to ensure they comply with GDPR guidelines.

Some personal information is stored on paper. Some of this data can be digitised. Where this is not possible documents will be kept under lock and key in a committee member's house since access to the Club's clubhouse is shared with the local bowling club and is not controlled.

The following persons within the club have access to and use personal information:

- Committee members – processing memberships, arranging club activities/events, sorting court booking issues, dealing with questions, comments, complaints
- Team Captains – use contact information to contact team members and arrange matches
- Other members – use contact information in an email list to organise and encourage participation at social tennis evenings ("Club Night")

Some personal information is shared with the following:

- Coach – names of some individuals who have active memberships is shared.
- LTA – names and membership/competition category of members may be shared
- NESLTA – names and competition category information of team members are shared

Individuals who have access to personal information held by the Club will need to adhere to the following procedures:

- Training:
 - Those individuals with internal access to personal information held by the Club will receive training on the GDPR principles and the Club's data protection procedures and must agree in writing to adhere to the Club's obligations. This training will be documented to record who has attended and when they last received training. Training will be reviewed periodically and redone when necessary such as when procedures are significantly changed or updated.
- Access review:
 - The list of individuals with access to personal information will be reviewed annually and restricted to only those for whom it is necessary.
- Password guidelines:
 - Those with access to personal information will be reminded to change their passwords regularly and should avoid using predictable passwords.
- Paper to be digitised:
 - Sometimes personal information is collected on paper forms. When this happens, the information should be digitised as soon as possible (ideally within a week) and the original paper form shredded before disposal.
- Sharing personal data:
 - When personal data are shared with committee members or with external partners (e.g. coaches) it must be encrypted and protected by a password before being sent. The password to access the data must be sent separately.

Data retention and deletion

Personal information will only be kept for as long as necessary to provide membership, Open Day, Booking or event services and kept to the minimum needed. Unless asked not to, data will be reviewed and possibly deleted where memberships have not been renewed for six years. This allows the Club to get in touch with past members if there are any concerns about their expired memberships. It also allows the Club to easily update records if individuals return to the club. Data collected from non-members (for example, during open days and public court bookings) will be reviewed and deleted after 3 years. This period aligns with the current time limit for bringing compensation claims for personal injuries. Electronically held data will be deleted from the database; paper records will be shredded before disposal.

Managing individual rights and subject access requests

Individuals can exercise any of the following rights by writing to the club at westhilltennisclub@outlook.com or by logging on to their account at www.clubspark.lta.org.uk/westhillawntennisclub.

Individual rights in relation to their personal information are:

- The right to know what the Club is doing with their personal data;
- the right to request access to the personal information that the Club holds about them by making a “subject access request”;
- the right to request a correction or completion to their personal information. If they are unable to make corrections through their ClubSpark account the Club will do the corrections for them and send an email to confirm that the changes have been made.
- the right to request that the Club restrict the processing of their personal information for specific purposes;
- The right to object to processing of their personal data in certain circumstances;
- the right to request that the Club delete their personal information when there is no good reason to continue processing it.
- The right to request the transfer of their personal data to another party.

Any requests received by Westhill Tennis Club will be considered under applicable data protection legislation. If the individual remains dissatisfied, then they have the right to raise a complaint with the Information Commissioner’s Office (ICO) at www.ico.org.uk

Subject access requests

An individual can request that the Club provide all personal data held by the Club on them. This request must be answered within 1 month and without charge. Committee members will be trained to recognise a subject access request and pass them on to the data protection manager. There is no particular form a subject access request can take. The Club may need to ask committee members to check and disclose material from private email accounts. The details and work flows of any subject access requests will be documented.

Personal data may be found:

- On the ClubSpark database
- In the Club email account and OneDrive
- In paper documents
- On old memory sticks or CDs
- In private email accounts of committee members

Manging data breaches

This policy sets out the steps taken to secure the personal data the Club processes (see Data storage, security and access control). These measures aim to protect against unlawful or unauthorised processing and against accidental loss, destruction or damage. In addition to these preventative measures, regular back-ups of the data held will be taken to enable the Club to quickly identify and restore the data that has been affected.

Certain types of security breaches, including hacking of data, inadvertent loss, mis-publication of data on a website or a serious interruption to data services must be reported to the ICO within 72 hours of the Club becoming aware of it. Reporting of data breaches is especially required where it is likely that the breach has affected individuals' rights and freedoms. Individuals will be notified where a breach has resulted in a particular individual's financial or special category data (such as health data) has been compromised.

In the event of a breach the Club will:

- Identify what data has gone missing and who has been affected
- Restore the affected data/services as soon as possible
- Where necessary, inform the ICO and the individuals affected

Privacy statements

Privacy Statement - membership

Westhill Tennis Club

What we need

Westhill Tennis Club will be a “controller” of the personal information that you provide to us in this form, unless otherwise stated.

When you register as a member of Westhill Tennis Club or renew your membership (including if you are registering or renewing on behalf of a child under the age of 18), we will ask you for the following personal information:

- contact details – name, address, phone numbers, email address, and emergency contact information;
- membership or criteria / category – date of birth and student status information
- equality information – gender identity
- financial information – debit or credit card details or direct debit information.

Why we need your personal information – contractual purposes

We need to collect our members’ personal information so that we can manage your membership. We will use our members’ personal information to:

- provide you with core member services, including, venue insurance, licensing and PVG checks for relevant volunteers;
- set up your online membership account and administer your account online; and
- send you membership communications by post or email in relation to essential membership services, including but not limited to, membership renewals and information on membership benefits and club events.

If you do not provide us with all of the personal information that we need to collect then this may affect our ability to offer the above membership services and benefits.

Why we need your personal information – legitimate purposes

We also process our members’ personal information in pursuit of our legitimate interests to:

- promote and encourage participation in the sport of tennis by sending members’ communications and booking information for upcoming competitions, events and club activities.
- provide competition in the sport of tennis by accepting and managing entries for our competitions and leagues and checking your personal information to ensure you are entered into the correct category or team;
- develop and maintain our members’ qualifications, including sending email communications to members to inform you of upcoming courses, renewal requirements and verify that you have completed any mandatory training and PVG / child protection requirements; and
- respond to and communicate with members regarding your questions, comments, support needs or complaints, concerns or allegations in relation to the sport of tennis. We will use your personal

information to investigate your complaint, suspend membership and take disciplinary action where appropriate.

Where we process your personal information in pursuit of our legitimate interests, you have the right to object to us using your personal information for the above purposes. If you wish to object to any of the above processing, please contact us on westhilltennisclub@outlook.com. If we agree and comply with your objection, this may affect our ability to undertake the tasks above for the benefit of you as a member.

Why we need your personal information – legal obligations

We are under a legal obligation to process certain personal information relating to our members for the purposes of complying with our obligations under the Protection of Vulnerable Groups (Scotland) Act 2007 to check that our coaches and volunteers are able to undertake regulated work with children and vulnerable adults.

Other uses of your personal information

We may ask you if we can process your personal information for additional purposes. Where we do so, we will provide you with an additional privacy notice with information on how we will use your information for these additional purposes.

Who we share your personal information with

We may be required to share personal information with statutory or regulatory authorities and organisations to comply with statutory obligations.

Such organisations include the Health & Safety Executive, Disclosure Scotland, and Police Scotland for the purposes of safeguarding children.

We may also share personal information with our professional and legal advisors for the purposes of taking advice.

As an affiliated club of the Lawn Tennis Association we are encouraged to recommend that all of our members are members of the Lawn Tennis Association as a condition of affiliation. We may share your name and membership category with the Lawn Tennis Association who will become a controller of your personal information when they receive it.

The Lawn Tennis Association's privacy notice explains how they use your personal information and can be accessed here <https://www.lta.org.uk/about-the-lta/policies-and-rules/privacy-policy/>.

In the event that we do share personal information with external third parties, we will only share such personal information strictly required for the specific purposes and take reasonable steps to ensure that recipients shall only process the disclosed personal information in accordance with those purposes.

How we protect your personal information

Your personal information is stored on our electronic filing system and our servers based in the UK, and is accessed by our staff and volunteers for the purposes set out above.

How long we keep your personal information

We will only keep your personal information for as long as necessary to provide you with membership services. Unless you ask us not to, we will review and possibly delete your personal information where you have not renewed your membership with us for six years.

Your rights

You can exercise any of the following rights by writing to us at westhilltennisclub@outlook.com or by logging on to your account at www.clubspark.lta.org.uk/westhilllawntennisclub.

Your rights in relation to your personal information are:

- you have a right to request access to the personal information that we hold about you by making a “subject access request”;
- if you believe that any of your personal information is inaccurate or incomplete, you have a right to request that we correct or complete your personal information;
- you have a right to request that we restrict the processing of your personal information for specific purposes; and if you wish us to delete your personal information, you may request that we do so.

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- you have a right to request that we restrict the processing of your personal information for specific purposes; and if you wish us to delete your personal information, you may request that we do so.

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Annual checklist

- Review data protection policy and procedures (keep version history)
- Review privacy statements (keep version history)
- Identify training needs and provide training when needed
- Review who has access to personal information
- Review PIA to identify new data processing