



Data Protection and Privacy Policy

Introduction

Crescent Lawn Tennis Club (hereafter referred to as 'the Club') must comply with relevant legislation. The processing of personal data is governed by the Data Protection Act 2017, the General Data Protection Regulation 2016/679 (the 'GDPR') and other legislation relating to personal data and rights such as the Human Rights Act 1998.

This Policy applies to all Personal Data which is collected, processed and stored by the Club in relation to its committee, service providers and members in the course of its activities. The Club makes no distinction between the rights of Data Subjects who are committee members, and those who are not. All are treated equally under this Policy.

Purpose and Scope

This Policy covers both Personal and Sensitive Personal Data held in relation to Data Subjects by the Club. This policy applies equally to personal data held in both manual and automated form. All Personal and Sensitive Personal Data will be treated with equal care by the Club. Both categories will be equally referred to as Personal Data in this policy, unless specifically stated otherwise.

Data Controller

The Club is the Data Controller and in the course of its daily organisational activities, the Club acquires processes and stores personal data in relation to its members and volunteers (of the Club) as well as Third party service providers engaged by the Club Crescent Lawn Tennis Club (e.g. Coaches)

Whilst there is no expectation that all of the Club's committee members to be experts in data protection legislation, the Club is committed to ensuring that its committee members have sufficient awareness of the legislation in order to be able to anticipate and identify a Data Protection issue, should one arise. In such circumstances, committee members must ensure that the Data Protection Officer is informed, and in order that appropriate corrective action is taken.

Due to the nature of the services provided by the Club there is regular and active exchange of personal data between the Club and its Data Subjects. In addition, the Club exchanges personal data with Data Processors on the Data Subjects' behalf.

This is consistent with the Club's obligations under the terms of its contract with its Data Processors.

This policy provides the guidelines for this exchange of information, as well as the procedure to follow in the event that a committee member is unsure whether such data can be disclosed.

In general terms, the committee member should consult with the Data Protection Officer to seek clarification.

Data Protection Principles

The GDPR sets out the main principles for organisations when processing data. The Club must ensure that personal data is:

- Processed lawfully, fairly and in a transparent manner in relation to individuals.
- Collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be considered to be incompatible with the initial purposes.
- Adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.
- Accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay;
- Kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes subject to implementation of the appropriate technical and organisational measures required by the GDPR in order to safeguard the rights and freedoms of individuals.
- Processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.

The Club will

- Consent of the Data Subject will be sought before their data is processed. Where it is not possible to seek consent, the Club will ensure that collection of the data is justified under one of the other lawful processing conditions – legal obligation, contractual necessity, etc.
- Where the Club intends to record activity on CCTV or video, a Fair Processing Notice will be posted in full view.
- Processing of the personal data will be carried out only as part of the Club's lawful activities, and will safeguard the rights and freedoms of the Data Subject.
- The Data Subject's data will not be disclosed to a third party other than to a party contracted to the Club and operating on its behalf.

- The Club will obtain data for purposes which are specific, lawful and clearly stated. A Data Subject will have the right to question the purpose(s) for which the Club holds their data, and the Club will be able to clearly state that purpose or purposes.
- Use of the data by the Club will be compatible with the purposes for which the data was acquired.
- Ensure that administrative and IT validation processes are in place to conduct regular assessments of data accuracy;
- Conduct periodic reviews and audits to ensure that relevant data is kept accurate and up-to-date. The Club conducts an annual review of sample data to ensure accuracy.
- Check Personal Data when it's collected and at regular intervals thereafter. If any personal data is found to be inaccurate or out-of-date, all reasonable steps will be taken without delay to correct or erase the data, as appropriate.
- The Club will ensure that the data it processes in relation to Data Subjects are relevant to the purposes for which those data are collected. Data which are not relevant to such processing will not be acquired or maintained.
- The Club will identify data categories, and have in place an appropriate data retention period for each category. Once the retention period has elapsed, The Club will ensure to destroy, erase or otherwise put this data beyond use.

Transparency

The Club needs to provide specific information to people about how it processes their personal data. This information needs to be actively provided to individuals in a way that is:

- concise;
- transparent;
- intelligible;
- easily accessible; and
- uses clear and plain language.

To provide this information, the Club must provide a privacy notice. The Club must ensure that the statement is targeted to the data subjects, particularly where children are being asked to provide data. It should be noted that the UK Government has determined that the age at which children can consent to the use of their data is 13.

Subject Access Requests

Any formal, written request by a Data Subject for a copy of their personal data (a Subject Access Request) will be referred, as soon as possible, to the Data Protection Officer, and will be processed as soon as possible.

It is intended that by complying with these guidelines, the Club will adhere to best practice regarding the applicable Data Protection legislation.

Your rights

Your right to access - Often referred to as a Data Subject Access Request, a person is able to request details of what data we hold on them, how it is being used and how it is

lawfully being processed. All such requests should be made to the Data Protection Officer and we will comply with all requests within a month. The Club may, if it deems a request to be unfounded or excessive, refuse such requests. In such cases the individual may refer to the Information Commissioner whose details are given below.

Your right to rectification - You can request that any inaccurate or incomplete data is updated. Requests should be made to the Data Protection Officer in writing, by telephone or in person. The Club will make any updates as soon as possible but no later than a month.

Your right to erase - An individual has the right 'to be forgotten' and request that all data relating to them be erased from the Club's record if they feel that the original processing process is no longer necessary, if they withdraw and consent to any consensual process, if they object on the basis of their believing there to be no overriding legitimate interest or dictated by a legal obligation. All such requests should be directed to the Data Protection Officer and all requests will be compiled within a month. The Club will however, retain the right to refuse but will only exercise this right if there is a legal obligation, if it relates to public interest or official authority task, for historical statistical archiving or for research purposes or to help assist a legal claim.

Your right to object - Individuals have the right to object to the processing of their personal data as a legitimate interest or if they disagree with your assertion that we are processing in the public interest, or official authority task, for historical statistical archiving or for research purposes. Individuals can also object if they feel that they are being unlawfully directly marketed to.

Your right to restrict - Individuals can block or suppress processing of their data (but allow the Club to retain it).

Your right for data portability - Individual may request that their data held by one organisation is transported to another - although the Club does not transport data to third parties.

Data Storage, Retention and Disposal

The Club will protect the personal data under its care. Appropriate security measures will be taken to protect against unauthorised access to, or alteration, destruction or disclosure of any personal data held by the Club in its capacity as Data Controller.

Access to and management of records is limited to those committee members who have appropriate authorisation and password access.

The Club shall not keep personal data for any longer than is necessary in light of the purpose or purposes for which that personal data was originally collected, held, and processed.

When personal data is no longer required, all reasonable steps will be taken to erase or otherwise securely dispose of it without delay. Where data contains personal information, the destruction must take place confidentially (e.g. shredding, disposed as confidential waste or secure electronic deletion).

Children

Children have the same rights as adults over their personal data which they can exercise as long as they are competent to do so. Where a child is considered not to be competent an adult with parental responsibility may usually exercise the child's data protection rights on their behalf.

Disclosure

The Club will not disclose personal data to a third party except in limited cases where there is a legal or statutory duty to do so or where it is in an individual's vital interests. The Club will take necessary care to ensure that personal data is not disclosed to unauthorised third parties which includes family members of the data subject, friends, government bodies and the Police in certain circumstances without the data subject's consent.

Where the Police are requesting data, this must be dealt with by the Club's Data Protection Officer on receipt of the required form.

Contacting us

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 the Club Chairman at:-

49 Sydney Road, Sidcup, Kent DA14 6RA

www.crescenttennisclub.co.uk

Telephone: 07544258166

Email: chairman@crescenttennisclub.co.uk

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.

Data Protection Definitions

Data	Data means information: <ul style="list-style-type: none">• Stored in a form capable of being processed by computer (such as word-processed documents, spreadsheets and databases).• Recorded in any form for later processing (such as registration forms, CCTV pictures).• Stored as part of a 'relevant filing system.' Note that this definition is very broad and covers such things as card indexes and microfiche files as well as traditional paper-based files. It would be best to assume that any paper-based data falls under the Act.
Personal Data	Personal data means any information relating to an identifiable person ('data subject') who can be directly or indirectly identified in particular by reference to an identifier. This definition provides for a wide range of personal identifiers to constitute personal data, including name, identification number, location data or online identifiers

Sensitive Personal Data	The 1998 Act distinguishes between "ordinary personal data" such as name, address and telephone number and "sensitive personal data" which includes information relating to racial or ethnic origin, political opinions, religious beliefs, trade union membership, health, sex life and criminal convictions. Under the Act the processing of such data is subject to much stricter conditions.
Data Controller	A person or entity who, either alone or with others, controls the content and use of Personal Data by determining the purposes and means by which that Personal Data is processed.
Data Subject	A living, identified or identifiable individual about whom we hold personal data
Data Processor	A person or entity who processes Personal Data on behalf of a Data Controller on the basis of a formal, written contract, but who is not an employee of the Data Controller, processing such Data in the course of his/her employment.
Data Protection Officer	The person appointed as such under the GDPR and in accordance with its requirements. A DPO is responsible for advising the University (including its employees) on their obligations under Data Protection Law, for monitoring compliance with data protection law, as well as with the Club's policies, providing advice, cooperating with the ICO and acting as a point of contact with the ICO.
Personal Data Breach	Any breach of security resulting in the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or unauthorised access to, personal data, where that breach results in a risk to the data subject. It can be an act or omission.
Relevant Filing System	Any set of information in relation to living individuals which is not processed by means of equipment operating automatically (computers), and that is structured, either by reference to individuals, or by reference to criteria relating to individuals, in such a manner that specific information relating to an individual is readily retrievable.

Date approved: June 2024

Review date: June 2006

Schedule of updates and amendments

Date of update/amendments	Update/amendment: