

## Privacy Policy

### Who are we?

This Privacy Policy is provided to you by Crescent Lawn Tennis Club (“the Club”) of 49 Sydney Road, Sidcup, Kent DA14 6RA which is the data controller for your data. We advise that you also read our Data Protection Policy on our website [www.crescenttennisclub.co.uk](http://www.crescenttennisclub.co.uk)

### Your personal data – what is it?

“Personal data” is any information about a living individual which allows them to be identified from that data (for example a name, photographs, videos, email address, telephone number, or address). Identification can be by the information alone or in conjunction with any other information. The processing of personal data is governed by the General Data Protection Regulation (the “GDPR”).

### Information that you give us

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

- Directly from you, when you fill in our membership application forms, activity or event entry forms, coaching forms, or any other online or paper based forms.
- When you make enquiries on our website.
- When you provide information via the Club’s management software or court booking system, or when you interact with us in various other ways (for example, where you enter leagues and competitions, renew your membership, sign up for a course or lessons).
- When you speak to, phone or email the Club or any Committee members or team captains at the Club.
- 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 Club).

### What data does the data controller process?

We may collect the following types of personal data about you:

- Names, titles and aliases;
- Contact and communications information, including your contact details (including email addresses, telephone numbers and postal addresses) and records of communications and interactions we have had with you.
- Financial information, including Direct Debit details and payment card numbers.
- Certain other information which you volunteer when making use of your membership benefits (for example, when making court bookings, entering leagues or competitions, or making use of other Club facilities).

- Photographs.
- On occasions, if this information is provided by you, process sensitive personal data such as racial or ethnic origin, mental and physical health, details of injuries, medication/ treatment received.
- We may also collect data about your health or medical conditions or those of your child, where you have volunteered this, for example so that we can cater for you when you attend a Club social event or a course/camp and to ensure the well-being of you or your child when participating in our coaching activities.

### **How do we process your personal data**

The Club will comply with its legal obligations to keep personal data up to date, to store and destroy it securely and not collect or retain excessive amounts of data. The Club will also keep your personal data secure and protect personal data from loss, misuse, unauthorised access and disclosure and to ensure that appropriate technical measures are in place to protect personal data.

### **How we use collected information**

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.

The Club collects and uses your personal information for the following purposes:

- Administration of the Club membership, including: informing you about court/ facilities opening hours, to provide the facility to book courts, and taking membership fees and renewal of membership;
- Fulfilment of orders for goods and services, including court bookings;
- To send members emails with details of news and events about the Club;
- To provide members and non-members with information about activities at the Club and the services that we provide and changes to our services, by email, post and text message and phone;
- To provide members with the facility to book courts (currently operated through LTA/Clubspark);
- To provide both members and non-members, both adults and adults on behalf of their children with the coaching activities that they have subscribed for, including one to one coaching, members' drop in sessions, members' team training, community tennis events, holiday camps for children and adult training camps;
- To contact members and non-members both adults and adults on behalf of their children regarding coaching activities;
- Storing your details on the software platform we use for our online Club member management database/ court booking system and for our league system. 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;
- To advise members of activities taking place at the Club which are run by third parties;
- Promoting our Club and promoting goods and services of third parties (for example, equipment suppliers, operators of coaching and other courses, and organisers of tennis events) where we think this will be of interest to you;
- To send members occasional questionnaires relating to the Club or its services;

- To display information on the Club's website, or on software operated by the Club, of team, tournament, or league results, or events in which members or non-members may have been involved;
- To post information or photographs regarding events in which you may have been involved on the website, Twitter or Facebook or Instagram;
- To contact members regarding team and inter-club matches;
- To advise the appropriate sporting bodies of team members' names for the purpose of inter-club matches;
- To provide details of teams and team captains on the website;;
- To carry out comprehensive safeguarding procedures in accordance with best safeguarding practice from time to time with the aim of ensuring that all children and adults at risk are provided with safe environments;
- Research and statistical analysis about who is playing tennis in our Club;
- To collate information to enable the Club to administer the Club and the website and other software used by the Club;
- To improve customer service. Your information helps us to more effectively respond to your customer service requests and support needs;
- To send members papers regarding Annual General Meetings, Extraordinary General Meetings or any other meetings of the Club;
- To keep minutes of meetings;
- To produce and circulate to members, lists of role holders including volunteer members of the Club;

### **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 Club. 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 news, events and activities at the Club, including venue closures, restricted hours, and changes to policies and procedures.

You are in control of how we communicate with you. You can update your choices and/or your contact details by contacting us at the Club using the contact details at the end of this policy.

### **What is the legal basis for processing your personal data**

#### **Consent of the data subject**

For processing some of our data we require your *consent* and we will require you to do this either by signing and returning a consent form to us.

For example:

- To send you details of any third party services or products the Club may consider of interest to you;

- To use your photograph on our website or elsewhere at the Club;
- To process any sensitive data, such as regarding your health;
- For other marketing purposes;

**Processing is necessary for the purpose of a contract with the data subject or to take steps to enter into a contract.**

We will process some data for the purpose of the performance of a *contract* (including any written terms and conditions relating to your membership) with you;

For example:

- This includes entering into a contract with the Club to become a member and for the Club to provide all benefits associated with membership including court bookings and other goods and services.;
- To enable you to participate in activities and competitions at the Club.

**Processing is necessary for compliance with a legal obligation**

Some of our processing is necessary to comply with a *legal obligation*:

For example.;

- To carry out safeguarding procedures for adults and children.

**Processing is necessary for the club's legitimate interests or a third party except where such interests are overridden by the interests, rights or freedoms of the data subject.**

Some of our processing is necessary for the club's *legitimate interests*: (for example in increasing use of the Club's facilities and participation in the game generally)

For example:-

- To maintain records of members and their playing levels;
- Storing your details on our software;
- Communications on Club news, events and activities;
- To keep financial records of invoices paid;
- To keep minutes of meetings;
- To collate information to enable the Club to analyse data and improve the Club's services;
- To send questionnaires to obtain your views about the Club's services;
- To collate information regarding teams, leagues and results
- To prepare, publish and circulate lists of volunteers and other role holders on our website and elsewhere at the Club.

**Special Category/Sensitive Data**

We will process some sensitive data, such as medical information where appropriate for both children and adults including members and also non-members undertaking our coaching activities at the Club.

We will process this information with your consent pursuant to Articles 6 and 9(A) of the GDPR as set out in our consent forms but, on occasions, processing will be necessary for the purposes of carrying out the obligations and exercising the specific rights of the controller or of the data subject in the field of employment and social security law or a collective agreement.

### **How we protect your information**

We adopt appropriate data collection, storage and processing practices and security measures to protect against unauthorised access, alteration, disclosure or destruction of your personal information, stored on our website and on other software used by the Club through third party service providers and on our own servers.

### **Sharing your personal information**

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 for the performance of our tasks or where you first gave us your prior consent:

- Our coaches and volunteers, for the purposes of administering your membership and coaching activities and giving you access to the membership or coaching benefits to which you are entitled;
- Our contractors and suppliers and any provider of membership management services
- ClubSpark – for membership fee payment - When you purchase anything via Sportlabs, we use a third party payment system called Stripe or GoCardless which transacts all our payments. We have no access to your card payment information.
- Coaching bookings, circulation of newsletters, court bookings and all member emails.
- Survey Monkey/Google forms for sending out questionnaires;
- Lawn Tennis Association – in relation to tennis members registration with British Tennis and for registration for Wimbledon tickets and all issues relating to competitive inter-club leagues.

When you access the Services via a third party social media provider such as Facebook, Google, Microsoft or a sports governing body, we may collect and store personal and non-personal information which is available on that third party social media provider, such as your name, its URL, your User ID, email address and gender information. We will also receive technical data in order to ensure the Services connect to the correct third-party account.

### **How long do we keep your personal data?**

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 Club 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.

### **Transfer of Data Abroad**

Any electronic personal data transferred to countries or territories outside the EEA will only be placed on systems complying with measures giving equivalent protection of personal rights either through international agreements or contracts approved by the European Union. Our website, our Twitter link and Facebook/Instagram pages are also accessible from overseas so on occasion some personal data (for example in a newsletter) may be accessed from overseas.

### **Third party websites**

Users may find advertising, or other content on our website that link to the sites and services of our partners, suppliers, advertisers, sponsors, licensors and other third parties. We do not control the content or links that appear on these sites and are not responsible for the practices employed by websites linked to or from our site. In addition, these sites or services, including their content and links, may be constantly changing. These sites and services may have their own privacy policies and customer service policies. Browsing and interaction on any other website, including websites which have a link to our website, is subject to that website's own terms and policies

### **Photographs**

The Club may take photographs or film events and these may be published on the Club website, social media platforms etc, or be displayed at the Club. We will not display such photographs unless we have the written consent of an adult or written parental permission of a child, to use such photographs. This consent is referred to on our consent forms mentioned above but may be withdrawn. Further details can also be found in our Photography and Filming Policy on our website.

### **Where we store your personal data**

We store the data that we collect from you on our own secure servers. The Club will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy.

Where you have been given a password which enables you to access parts of our website or any of the other software that is used by the Club to provide services to Users, you are responsible for keeping this password confidential. The Club requests that you do not share this password with anyone.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our website or any of other online services: any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to prevent unauthorised access.

### **Non-personal identification information**

We may collect non-personal identification information about you whenever you interact with our website. Non-personal identification information may include the browser name, the type of computer and technical information about your means of connection to our website, such as the operating system and the Internet service providers utilised and other similar information.

### **Web browser cookies**

Our website may use "cookies" to enhance your experience. Your web browser places cookies on their hard drive for record-keeping purposes and sometimes to track information about you. You may choose to set your web browser to refuse cookies, or to alert you when cookies are being sent. If you do so, note that some parts of the website may not function properly.

### **Changes to this privacy policy**

If we wish to use your personal data for a new purpose, not covered by this notice, then we will provide you with a new notice explaining this new use prior to commencing the processing and setting out the relevant purposes and processing conditions. Where and whenever necessary, we will seek your prior consent to the new processing.

### **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](http://www.crescenttennisclub.co.uk)

Telephone: 07544 258166

Email: [chairman@crescenttennisclub.co.uk](mailto: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](http://www.ico.org.uk).

**Date approved: June 2024**

**Review date: June 2026**

**Schedule of updates and amendments**

| Date of update/amendments | Update /amendment: |
|---------------------------|--------------------|
|                           |                    |