

Data Protection and Privacy Policy

Hanham Community Centre Tennis Club

For the purposes of the Data Protection Act 2018 ("DPA 2018"), the controller is Hanham Community Centre Tennis Club (the "Venue") of Abbots Road Hanham Bristol BS15 3NQ.

Reference to the "GDPR" means Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (General Data Protection Regulation).

About this document

This privacy policy sets out the way we process your personal data and we've created this privacy policy to make sure you are aware of how we use your data as a member of our tennis venue.

How we collect your information

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

- Directly from you, when you fill in an application for membership, when you make enquiries on our website, when you provide information via the Venue's club management software 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 Lawn Tennis Association (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 Venue member management database / court booking 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;

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 forms of communication, 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, events 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: 079707535072434 (Giles Kirkham – Chairman Hanham Community Centre Tennis Club) or 0117 9674439 (Hanham Community Centre)

Email: gileskirkham@hotmail.com

Post: Hanham Community Centre (Tennis Club Section), 118-124 High Street, Hanham, Bristol BS15 3EJ

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, but only where necessary:

- Our Tennis Committee volunteers, for the purpose of administering your membership and giving you access to the membership benefits to which you are entitled.
- Our Tennis Coaches, Hanham Community Centre (HCC) Management Team (as each Hanham Community Centre Tennis Club member is also a member of the HCC) and (where specifically opted by each member) the LTA Membership scheme.

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 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.

Data Protection

DPA 2018 Principles;

Under the DPA 2018, the data protection principles set out the main responsibilities for organisations, these are as follows:

That data shall be-

- 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; and
- 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.”

It is a requirement under Article 5(2) of the GDPR that the controller shall be responsible for, and be able to demonstrate, compliance with the principles.

Handling Personal Data

The DPA 2018 applies to ‘personal data’ meaning any information relating to a natural living person 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 identifier, reflecting changes in technology and the way organisations collect information about people.

DPA 2018 applies to both automated personal data and to manual filing systems where personal data are accessible according to specific criteria. This could include chronologically ordered sets of manual records containing personal data.

All tennis club administrators have a responsibility to protect personal data and will take steps to ensure that personal data is kept secure at all times against unauthorised or unlawful loss or disclosure.

Tennis club member Personal data is held in a private DropBox Cloud environment and is managed by designated Tennis Club committee members. Only those committee members strictly needing access to Personal data as part of their duties have such access. The club endeavours to maintain physical, technical and procedural safeguards that are appropriate to the sensitivity of the personal information in question. These safeguards are designed to protect your personal information from loss and unauthorized access, copying, use, modification or disclosure.

DropBox Cloud server are situated in the US. DropBox has signed up to the EU-US Privacy Shield <https://www.privacyshield.gov/Program-Overview> to ensure safety of EU citizens data held in the US.

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 Robert James, Chairman of Hanham Tennis Club:

Telephone: 07535072434 (Giles Kirkham – Chairman Hanham Community Centre Tennis Club) or 0117 9674439 (Hanham Community Centre)

Email: gileskirkham@hotmail.com

Post: Hanham Community Centre (Tennis Club) 118-124 High Street Hanham Bristol BS15 3EJ

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.