

SHEEN LAWN TENNIS & SQUASH CLUB

MEMBERS' AND USERS' PRIVACY POLICY

This Privacy Policy applies to members and users of Sheen Lawn Tennis & Squash Club.

For the purposes of the General Data Protection Regulation ("GDPR") and UK data protection laws, the Data Controller is the non-incorporated members' club called Sheen Lawn Tennis & Squash Club ("the Club") and Sheen Lawn Tennis & Squash Club Limited ("the Company"), each of Parklands Close, East Sheen, SW14 7EH, and together "SLTSC".

About this document

This privacy policy sets out the way we collect and process your personal data and we've created this Privacy Policy to make sure you are aware as a member or user of the Club and our facilities of how we use your personal data. This policy is effective from 25th May 2018. We may amend and re-issue this policy at any time without prior notice to you being required.

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 of the Club, when you make enquiries on our website, when you provide information via our club management software or court booking systems, or when you interact with us during your time as a member or user of our facilities in various other ways (for example, where you enter a sporting competition, renew your membership, sign up for a course of coaching lessons);
- From someone else who has applied for membership or use of our facilities on your behalf (for example a family member, guardian, or a tennis or squash coach who has provided us with your contact details at your request for that purpose);
- From the Lawn Tennis Association (LTA) or England Squash (for example, where one of these organisations passes on your details to us in connection with a query or complaint you have raised with them about SLTSC);
- From time to time you may need to provide us with evidence of identity, age or residence in order to qualify for certain subscription levels or to pay our fee, but that identity information, other than those items stated below, is not held in our membership system;
- Your photographic image may appear in pictures we display on our website;
- Your photographic image and/or your name may appear on one or more of our social media websites;

- Your video image may appear in our website camera feed of our tennis court and recreation area;
- Your video image may be recorded in our CCTV security camera system.

The types of information we collect

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

- Title, name, address, email address, telephone numbers, gender, year of birth, family discount eligibility and British Tennis Membership number (where applicable). This information is collected by means of a signed membership application which is provided by you, the member, or by your parent/guardian at the time of joining the Club;
- Information about certain of your health or medical conditions but only where you have volunteered this: for example so that we can consider requests regarding subscription suspensions, process injury information reasonably required by our insurers, or cater for your specific personal needs when you attend a Club social event, a playing course/camp, or a similar sporting or social activity;
- When we make a direct online payment to you from one of our banks, for example for a refund of an amount you have paid, your bank account number and sort code may be stored in our bank's secure online payment system. You may at any time ask us to delete any such personal information;
- Certain other information which you volunteer when making use of benefits specific to your membership or usage of the Club and our facilities (for example, your tennis ranking, when making court bookings, or when making use of other Club facilities);
- Your photographic and/or video image.

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 Club membership, including:
 - informing you about playing court/facilities availability and opening hours;
 - taking payment of subscription, playing court booking, tournament entry and other membership and participatory fees;
- Storing your details on the software platforms we use for our online club member management systems and court booking systems;
- Fulfilment of orders for goods and services, including playing court bookings;
- Administration of the Wimbledon Ticket Ballot;
- Where this is necessary for the performance of a contract (including any written terms and conditions relating to your membership, such as our Club Constitution) with you;

- Research and statistical analysis about who is playing tennis or squash in our Club or is otherwise using our facilities;
- Informing us of your preferences and dislikes for purposes of assessing the needs and requirements of SLTSC;
- Communication about our Club activities that we think may be of interest to you;
- Where this is necessary for our legitimate interests (for example, in increasing the use of SLTSC's facilities, in surveys and participation in the sports of tennis and squash generally);
- Promoting our Club;
- Promoting goods and services of third parties which are closely related to your membership of the Club (for example, operators of coaching lessons and courses, organisers of tennis and squash events, and of suppliers of tennis and squash equipment) where we think this will be of interest to you as a member;
- Wherever this is necessary for our legitimate interests (or the legitimate interests of a third party), by regulation or statutory obligation, 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 communications, however, that we need to send to you regardless of your marketing preferences in order for us to fulfil our contractual obligations to you as a member or user of our Club. Examples of these essential service communications are:

- Confirmation of transactions, such as payment receipts;
- Membership related mailings such as your membership renewal invoice and any reminders, notices of formal meetings, and information about Club events and activities;
- General Club newsletters and general newsletters relevant to your section of membership or usage of our facilities. You may however opt-out at any time from being sent such general newsletters.

Control of your data

You are in control of how we communicate with you. The personal information in our membership system used by SLTSC is available for you to view and amend yourself in your member profile. This is accessed using the website username (or email address) and password that was issued to you by SLTSC at the time of joining. You can also change your password at any time.

Alternatively, you may request amendments and deletions to our membership system, and also to our other systems which may contain your personal information, or obtain a copy of your data from the Administrator:

Telephone: 0208 878 7650
Email: office@sheenltsc.co.uk
Post: The Clubhouse, Parklands Close, SW14 7EH

Sharing your information with others

We do not sell your personal data. We do not share your personal data with other organisations or persons 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:

- Club volunteers and Company employees, for the purposes of administering your membership and giving you access to the membership benefits to which you are entitled;
- Our systems providers who host our membership, bookings management, website, email, and online security backup and recovery services;
- Our debit/credit card payment gateway systems supplier through whom we collect some membership subscriptions, court and tournament fees, and other revenues. We do not retain any of your personal debit/credit card financial data as this is processed entirely within the systems of our gateway supplier;
- Our contractors and suppliers, including providers of outsourced coaching services;
- Other Club members generally where we make accessible your name, email and telephone number via the members secured website in order to facilitate the general arranging of sporting or social activities involving you as a member which are core to your membership of the Club. Access to this personal information is not accessible by the general public. We make such personal data accessible generally to other Club members through the members secured website only if you have specifically opted-in for the service and you may opt-out at any time by changing this setting in your membership profile in the members secured website system;
- Other Club members generally where we make accessible your name via our secured Court Booking Directory systems in order to facilitate the online booking of and payment for playing courts involving you as a member which is core to your membership of the Club. Access to this data item is not accessible by the general public. We make such personal data accessible generally to other Club members through the Court Booking Directory system for all Full and Off Peak Tennis and Squash members. You may opt-out from this at any time but doing so would prevent you from booking tennis and squash playing courts online. Youth and other non-Full Club members may opt-in at any time;
- Selected other Club members where we may provide your name, email and telephone number in order to facilitate your participation in box league and intra-club playing events where you choose to enter such events. Access to these data items is not accessible by the general public. We make this personal data accessible to other Club members who participate in such events through email and/or emailed shared Excel spreadsheets. It is a condition of your entry into such events that you agree to this limited use by us of your personal data;

- Selected other Club members and selected members of the public where we may provide your name, email and telephone number in order to facilitate your participation with other clubs and organisations where you choose to represent the Club in a sporting match. These data items are made available via email and/or telephone between the relevant Club volunteers or employees who organise such matches and those members of the public who may represent the particular competing club, tournament or organisation at the time. It is a condition of your participation in such matches that we may make such personal data accessible in this way where you have chosen to represent the Club in a sporting team;
- The LTA and England Squash in order to provide you with benefits associated with your Club membership, such as participation in the Wimbledon Ticket Ballot;
- Other Club members and the general public where your photographic image may appear on our Club website or on one or more of our social media websites in photographs of sports play or social activities in and associated with the Club. You may ask at any time for your image to be removed from these websites should you so wish. We comply with the LTA Tennismark Photography and Filming of Children Policy;
- Other Club members and the general public where your name may appear on one or more of our social media websites in postings related to sports play or social activities in and associated with the Club. You may ask at any time for your name to be removed from these websites should you so wish;
- Other Club members and the general public where your video image may appear in our website video feed which we make available to members to facilitate their assessment of playing/weather conditions on our tennis courts and generally to share in the enjoyment of the Club and its facilities. We do not record or store such video images;
- Other Club members and the general public where your name may appear in our premises or on our website in connection with a sporting or Club event, for example on our honours board, tournament scoreboards, or notices of participants in events;
- Law enforcement authorities when at their legitimate request we may make our CCTV security camera system video data available to the police. Our CCTV system otherwise routinely deletes such generally collected video images within a short period by overwriting them;
- Certain statutory bodies, including the police and designated local authority personnel in the rare event that our over-riding responsibilities under our duty of care to others or under the LTA Safeguarding Policy with which we comply so require.

How long your personal information is kept

You may withdraw from membership of the Club by giving notice in writing in accordance with Rule 9 of our Constitution. You are also deemed under the Constitution to have resigned your membership if, more than thirty days after your subscription renewal date, your renewal invoice remains unpaid. In certain other rare circumstances as defined in our Constitution your membership may be terminated by the Club. A maximum of two calendar months after you have ceased to be a member we will clear your personal details from our membership, Court Bookings Systems and subscriptions databases so that there is no data held that could identify you as a person. We retain your paid subscription data in order to retain the integrity of our financial accounting records and for other statutory and regulatory purposes for a period

of six years after the year in which your membership of the Club has ceased. After this time or after the expiration of any longer statutorily required retention period all such remaining data will be deleted.

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.

The above rights are not absolute, and we may be entitled to refuse requests where certain exceptions apply.

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 the Administrator:

by email:	office@sheentlsc.co.uk
by telephone:	0208 768 7650
or by post:	The Clubhouse, Parklands Close, SW14 7EH

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.

Bob Dinsdale
Company Chair & Director
Sheen Lawn Tennis & Squash Club Limited

Joanna Mills
Club Chair
Sheen Lawn Tennis & Squash Club