

# Grundisburgh Tennis Club Privacy Policy

Last updated: 2nd October 2020

Summary of changes since previous version on 5<sup>th</sup> March 2019: Added contact tracing for COVID-19 to how personal data is used as well as adding that names of people attending bookings will be collected. Explicitly mentioned court booking as a method of data collection.

For the purposes of the General Data Protection Regulation ("GDPR") and UK data protection laws, the controller is Grundisburgh Tennis Club (the "Venue") of Grundisburgh Playing Fields, Ipswich Road, GRUNDISBURGH Suffolk IP13 6TJ.

## **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 non-member, member, supplier or contractor of our tennis venue.

## **How we collect your information**

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

- Directly from you; i.e. when you fill in an application for membership, book a court, attend an event, make enquiries on our website, provide information via email, social media, telephone or in person and other times you have interacted with us (for example, where you enter a competition, renew your membership, sign up for a course or lessons or provide services to the Venue);
- 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);
- Indirectly from other organisations:
  - From the Lawn Tennis Association (LTA) (for example, via your British Tennis Member (BTM) membership or where the LTA passes on your details to us in connection with a complaint or query you have raised about our Venue).
  - From SportLabs, who provide the Venue's club management software "ClubSpark" in partnership with the LTA. Use of that website is subject to its own privacy policy.
  - These external organisations are subject to their own privacy policies.

## **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);
- Names and ages of all members under your membership;
- Membership type, start and expiry dates;
- Payment information and records;
- Certain other information which you volunteer when contacting us or making use of your membership benefits (such as your reason for interest in the club and providing your LTA British Tennis Membership details).
- Consents you have provided to us including Wimbledon ballot, parental consent to store children's details, receiving emails from us and media consent;
- Photos of you participating in tennis club activities and events if you have provided the relevant media consent;
- Records and results of tennis matches you have played in;
- Attendance on courses and at events and records of any court bookings including the names of other people attending the booking with you;
- Work performed for the Venue including any invoices

## **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 club events, courses, court bookings;

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 and other club and tennis related activities that we think may be of interest to you (such as tournaments, coaching and club events);
- Storing your details on the ClubSpark software platform we use for our online Venue member management database / court booking system. Please note that your own use

of ClubSpark 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 tennis related services of third parties (for example, operators of coaching courses, and organisers of tennis events) where we think this will be of interest to you;
- May be used by Sportlabs for the purposes of providing the ClubSpark Portal. This is used by the Venue to administer and manage your membership as outlined in this privacy notice;
- Administration of the Wimbledon ballot;
- Contact tracing during the COVID-19 pandemic;

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 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 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 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: Grundisburgh 738872
- Email: [privacy@grundisburghtennis.co.uk](mailto:privacy@grundisburghtennis.co.uk)
- Post: Grundisburgh Tennis Club, Harvest View, Meeting Lane, Grundisburgh IP13 6TT

### **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, where necessary:

- Our volunteers, for the purposes of administering your membership and giving you access to the membership benefits to which you are entitled.
- LTA where necessary for safeguarding and administering the Wimbledon ballot
- Sportslabs\ClubSpark for the purposes of providing the ClubSpark Portal. ClubSpark act as a data processor on our behalf to enable us to effectively manage your club membership and host the Venue's website. Personal details are not shared or used for any marketing or commercial purposes by Sportslabs other than where anonymised data may be used for usage and participation reporting and statistical analysis by ClubSpark and the LTA.
- 1and1 Internet\Open-Xchange as data processor for the Venue's email hosting. Please be aware that email is inherently insecure until it reaches us and as such we recommend that you do not send personal data via email.
- Dropbox as data processor for the Venue's electronic file storage.
- Other contractors, suppliers or third parties, including coaches, tournaments or other venues, where you have requested a service from us – i.e. for information on a course, signing up to a tournament or to facilitate group play.
- With the relevant government agencies or for the purposes of contact tracing and/or notification during the COVID-19 pandemic

### **Location of your personal data**

All personal data is either stored within the European Economic Area (EEA) or in the case of Dropbox personal data may transferred outside the EEA but is still protected under the EU-US Privacy Shield framework.

### **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 a 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.

## **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 us at:

- Telephone: Grundisburgh 738872
- Email: [privacy@grundisburghtennis.co.uk](mailto:privacy@grundisburghtennis.co.uk)
- Post: Grundisburgh Tennis Club, Harvest View, Meeting Lane, Grundisburgh IP13 6TT

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).