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**Privacy Policy for Members**

For the purposes of the General Data Protection Regulation ("GDPR") and UK data protection laws, the data controller is ESHER LAWN TENNIS CLUB (the “Club”) of 7, Milbourne Lane, Esher, Surrey KT10 9DU.

**Legal basis for collecting your personal data**

Esher Lawn Tennis Club collects personal data for the purposes of its legitimate interests as a membership organisation and on a contractual basis for processing and recording membership applications and renewals.

For some data, such as that relating to contractual or financial matters, the basis for its collection and retention is to comply with our legal obligations. Such data must be retained for 7 years.

**About this document**

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

Members’ details will be processed fairly and lawfully in order to satisfy the agreement entered into with you on your admittance to membership.

**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 via our website, when you provide information via the Club’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 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).

**The types of information we collect**

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

* Contact and communications information (including members’ names, email address(as), telephone numbers and postal address(es) and records of communications and interactions we have had with you);
* DBS (Disclosure and Barring Service) checks and authorisation (where necessary) carried out with the member’s knowledge and permission;
* 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 Club facilities);
* Age of Juniors and contact and communications details for the Adult associated with the Junior membership.
* Scores from tournament, league and team matches that you have played in.
* Any information relating to disciplinary matters

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 Club social event or a course/camp. It is vital for the Club to have any such data, which may have an impact on your activities at the Club. Such data will be kept separate from other data with access only by those with a need to know in order to prevent any medical incidents.

**Where the data comes from**

Data about our members comes directly from our members when you join or re-join

the Club. You have the right to request the Club to change any incorrect personal data (see section below “Your rights”).

**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 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 Club;
* Communication via e-mail and newsletters about our Club activities and opportunities for volunteering that we think may be of interest to you and which are necessary for the functioning of the club.
* Storing your details on the software platform we use for our online Club 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 Club’s facilities and participation in the game generally);
* Promoting our Club 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 legitimate interest to you;
* To contact you about ELTC tournaments, team matches, coaching and other tennis activities. Your data may be shared with other club members as necessary for the functioning of any tournaments, team matches etc. This will be generally be limited to your name, e-mail address and phone number as these are necessary to enable members to contact each other to arrange matches etc.
* To contact you about essential aspects of your membership of the Club such as AGMs, EGMs, renewals;

**Your marketing preferences**

We will always respect your wishes in respect of the 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 Club closures and holiday opening hours.
* E-mails and newsletters providing information about activities at the Club covering things like fund-raising, tournaments, team matches etc.

The aim of such communications are to promote and encourage participation in tennis and the Club’s activities in general for all ages and abilities.

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: 07385 871035

Email: eshertennisclubsecretary@gmail.com

Post: 7, Milbourne Lane, Esher, Surrey KT10 9DU

**Photos**

The Club will take photos and maybe videos of special occasions, tournaments etc and these may be put on the web site, on social media or displayed at the Club without identifying names. The purpose of this is to increase awareness of events and activities at the Club and to promote the Club in general.

**Access to your data**

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 employees and volunteers, for the purposes of administering your membership and giving you access to the membership benefits to which you are entitled and in order for them to be able to carry out any other legitimate tasks for the Club;
* Our contractors and suppliers, including coaches, any provider of membership management services and any other third parties;
* If your data is transferred to a third party for processing, then your Club has the responsibility of ensuring that the third party is GDPR compliant.
* The LTA and any outside leagues of which ELTC is a member, plus HMRC and other governmental organisations, which have a legal requirement to have access to personal data.

**How long your information is kept**

We keep your personal data only for as long as is necessary for each purpose we use it. For most membership data, this means we retain it as long as you have a valid Club membership and for a period of seven years after your last interaction with us (for accounting, tax reporting and record-keeping purposes).

**How your data is stored**

Your personal data is mainly stored in digital form on computers and in the form of written documents (match results, tournament details, committee details. ELTC uses Clubspark, the LTA approved and supplied system, for handling membership data. Any information that is stored remotely is stored in the EU in compliance with the GDPR.

Electronic data is kept on a password protected computer or as a password protected document. Information kept in hard copy is kept as securely as possible and is restricted to those with a need to know.

If a data breach occurs, the Club has 72 hours in which to inform the Information Commissioner’s Office unless it is unlikely to result in a risk to the rights and freedoms of the individual.

**Your rights**

Under certain circumstances, by law you have the right to:

* Request access to your personal data (commonly known as a "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. We are required to provide this to you within one month of a request.
* 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). However, we need basic contact data for you in order for you to be able to continue with your membership.
* 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 internal ELTC 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.
* Request the transfer of your personal data to another party.

There is not usually a fee for providing this data, although we can charge a reasonable fee based on the administrative cost of providing this information if a request is obviously unfounded or frivolous or for second or more requests for the same information.

Please note that the above rights are not absolute, and we may be entitled to refuse requests where exceptions apply.

**Contact and complaints**

Under the GDPR, we do not have a statutory requirement to have a Data Protection Officer.

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 [●]:

* by email: eshertennisclubsecretary@gmail.com
* by telephone: 01372 464 300;
* or by post: 7, Milbourne Lane, Esher, Surrey KT10 9DU.

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).