



# **Blackheath Lawn Tennis Club**

## **Privacy (GDPR) Policy**

**Reviewed January 2024**

**Date of next review January 2025 or before if there is a change in legislation**

**Chairperson:** Diana Gaines

**Welfare Officers:** Emily McCann

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## **BLACKHEATH LAWN TENNIS CLUB**

### **PRIVACY (GDPR) POLICY**

For the purposes of the General Data Protection Regulation (GDPR) and UK data protection laws, the controller is Blackheath Lawn Tennis Club (the Club) of Rectory Field, Charlton Road, London SE3 8SR. BLTC is a not-for-profit unincorporated association.

#### **1. About this document**

1.1 This Privacy Policy, together with our membership and coaching terms and conditions, our Club rules and policies/regulations and any other documents referred to in the policy, explain how we will collect, process, use and protect information which we collect from you or which you provide to us.

#### **2. How we collect your information**

2.1 We may collect your information in a few limited ways, namely:

- Directly from you when you fill in an application for membership and/or coaching, when you make enquiries to our website, when you provide information via our Club management software or court booking system or when you interact with us during your time as a member/coaches in various other ways (for example when you enter a competition, renew your membership, sign up for a course or lessons, email us, complete a survey etc).
- From someone else who has applied for membership and/or coaching on your behalf (for example 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 the Club).

#### **3. The types of information we collect**

3.1 We may collect the following types of personal information about you.

- Contact and communication information, including your contact details (including email address (es) telephone numbers and postal address (es) date of birth, gender and records of communication and interactions we have had with you).
- Financial information including payment information.
- 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).

3.2 We may also collect information about your health and medical conditions where you have volunteered this, for example, so that we can take this into account when you attend the Club to play or have coaching.

#### **4. Acceptance of Terms**

4.1 By submitting to us or using our website or registering for services through the website you:

- Agree to accept the data processing outlined in this Privacy Policy and
- Consent to us collecting and processing your personal information in accordance with this Privacy Policy.

## **5. Use of your information**

5.1 Personal information provided to us will be use for the purposes set out at the time of collection and where relevant, in accordance with any preferences you express.

5.2 More generally, we will use your personal information for the following purposes:

- informing you about court/facilities opening hours and any changes to the coaching timetable.
- administering of your court booking (please note that your name will appear on our court booking system including the screen in the clubhouse
- taking payments of membership fees.
- taking advice and action in relation to the collection of debts.
- providing information of any services you have requested, including through the use of email messages where appropriate.
- the enforcement of our terms and conditions, policies, regulations and Club rules
- informing you of any policy changes or health and safety issues
- storing your details on the club management system (where this is necessary for our legitimate interests). Note that your own use of the software or system is subject to the terms and conditions and Privacy Policy published on that site.
- fulfilment of orders for goods and services, including items purchased, court bookings.
- in any other way as described to you at the time of collection of your personal data.
- research and statistical analysis about who is playing tennis in our Club.
- communication about our Club's activities that we think may be of interest to you.
- to notify you about our products, services, sponsors, or special offers that may be of interest to you, notification of member/coaching services and profiling your membership/coaching preferences.

## **6. Disclosure of your information**

6.1 We value your privacy and do not sell your personal information to any third party under any circumstances.

6.2 We may include announcements in some Club communications, but we do not provide any of your personal information to third parties, except where required by law and except set out below.

- To our agents, contractors, and employees of the Club to administer your membership, your account and any products and services provided to you now or in the future.
- To any provider of membership management services.
- To our systems provider and other distributors for the purpose of the distribution of other Club information to you. Please note that the distribution platform is subject to the Terms and Conditions and Privacy Policy published on that site.
- To anyone to whom we transfer or may transfer our rights and duties under our agreement with you.
- If we have a duty to do so or if the law allows us to do so. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk issues.
- To third parties who will help process or administer Club services or who will provide advice and act in relation to the collection of debts.

## **7. Communicating with you**

7.1 We will only send email messages to individuals who have requested that these mailings be sent to them, or as part of an ongoing relationship we have with an individual or business.

7.2 Your right to control what communications, if any, that you receive from the Club is important to us. The information below will assist you in understanding the different communications options you have and how you can notify us of changes in your preferences or to unsubscribe in general.

7.3 We provide notifications to members and those on our coaching programme including (without limitation) membership information, coaching changes or cancellations, membership and coaching terms and conditions together with invoices. As these emails are a necessary part of how we run the Club we need to be able to send them to you regardless of your marketing preferences.

7.4 You can update your preferences and contact details in settings on the MyCourts system.

## **8. How Long your information is kept.**

We keep your personal information only for as long as necessary for each purpose we use it. For most membership information, this means we retain it for as long as you have a valid Club membership and/or coaching and for a period after your last interaction with us (for accounting and record keeping purposes).

## **9. Access to information**

9.1 You have the right to make a written request for a copy of the personal information that we keep about you or to correct the details that we hold about you.

9.2 Under certain circumstances you have the right in writing to:

9.2.1 Request access to your personal information (commonly known as a 'data subject access request'). This enable you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.

9.2.2 Request corrections of the personal information that we hold about you. This enables us to have any incomplete information or incorrect information we hold about you to be corrected.

9.2.3 Request erasure of your personal information. This enables you to ask us to delete or remove your personal information where there is no legitimate reason for continuing to process it. You do have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).

9.2.4 Object to processing of your personal information where we are relying o a legitimate interest (for those of a third party) and there is something about your 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 information for direct marketing purposes.

9.2.5 Request the restriction of processing your personal information. This enables you to ask us to suspend the processing of personal information about you, for example, if you want 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 information.

9.2.6 Request the transfer of your personal information to another party.

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

## **10. Changes to Policy**

10.1 We reserve the right to update, modify and/or change this Privacy Policy at any time. Any such changes will be posted here. If you continue to use a Club service after we have changed the Privacy Policy, you hereby consent to be bound by any such changes.

## **11. Security**

11.1 In order to comply with our obligations under the GDPR, we will protect your personal data from unauthorised access, misuse, alterations, or loss by using commercially reasonable security measures. Any payment transactions will be made using encryption technology.

11.2 Nothing in this policy in any way excludes or limits our liability for negligence causing death or personal injury or for fraudulent misrepresentation.

11.3 The data that we collect from you may be stored at a destination outside the European Economic Area where we are using carefully selected third party platforms, for example Mailchimp for marketing or MyCourts membership accounts. All such data is subject to the third party's Privacy Policy.

11.4 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 it.

11.5 We are not responsible or liable to you for any loss or damage you may suffer or incur in connection with your use of this site which is caused by an event beyond our control which includes the transmission of information by electronic means, material content and data over the internet and the use of it by others.

11.6 When you become a member and/or undertake coaching you will be provided with a password which enables you to access certain parts of our site and the Mycourts system. You are responsible for keeping this password confidential. Please do not share your password with anyone.

## **12. Comments, Suggestions and Complaints**

If you have any queries about this Privacy Policy or how we process your personal information or if you wish to exercise your legal rights to make a complaint, you can contact the Club:

- by email to [Membership@blackheathlawntennisclub.org.uk](mailto:Membership@blackheathlawntennisclub.org.uk)
- by post: Blackheath LTC, Rectory Field, Charlton Road, London, SE3 8SR

If you are not satisfied with how we are processing your personal information or dealing with your complaint, 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)