

The General Data Protection Regulation (GDPR) will take effect in the UK, and across the EU, on 25 May 2018. The GDPR and existing data protection law applies to organisations regardless of size. The basic structure of data protection law will remain the same after May 2018 however the introduction of the GDPR has implications for tennis venues of all sizes and structures, including Headstone Tennis Club.

Headstone Tennis Club hold and use the personal data of individuals (mainly details of their members i.e. names, addresses, phone number, email address and date of birth). Organisations that hold personal data and use and determine how this data is used are known as '**data controllers**'.

Individuals will continue to have rights which must be observed by tennis venues (as data controllers).

What is GDPR?

The General Data Protection Regulation is a new, European-wide law that replaces the Data Protection Act 1998 in the UK. The main principles of data protection law will remain unchanged however GDPR places greater obligations on how organisations handle personal data. It comes into effect on 25 May 2018 and is regulated in the UK by the Information Commissioner's Office (ICO).

What information does GDPR apply to?

The GDPR applies to "personal data", which means any information relating to an identifiable living person.

What are the main requirements of GDPR?

Headstone Tennis Club must comply with the Data Protection Principles, a set of rules for the handling of personal data.

The Data Protection Principles require that personal data is:

- *processed lawfully, fairly and transparently;*
- *adequate, relevant and no more than is necessary;*
- *accurate and kept up-to-date; and*
- *processed securely.*

HEADSTONE TENNIS CLUB PRIVACY POLICY

For the purposes of the General Data Protection Regulation ("GDPR") and UK data protection laws, the controller is Headstone Tennis Club (the "Venue") of Hillfield Close, North Harrow, HA2 6AZ.

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, 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 parent on behalf of their child/children, 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 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);
- Certain other information which you volunteer when making use of your membership benefits (for example, 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;
- Facilitate participation in internal / external tennis competition;
- Fulfilment of orders for goods and services;
- 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 / events that we think may be of interest to you;
- Storing your details on our electronic management database system and email marketing tool. 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;
- Promoting our Venue and promoting goods and services of third parties (for example, equipment suppliers, operators of coaching courses, and organisers of tennis and social 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.

- Parents / Legal Guardians on behalf on their child/children are consenting to their child's / children's data being used as prescribed above.

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 (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: 020 8933 0003

Email: info@headstonetennisclub.co.uk

Post: Headstone Tennis Club, Hillfield Close, North Harrow, HA2 6AZ.

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 employees and volunteers, for the purposes of administering your membership and giving you access to the membership benefits to which you are entitled.
- Our contractors and suppliers, including coaches and organisers of Club events and competitions.

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 Julia Ginger:

- by email: info@headstonetennisclub.co.uk;
- by telephone: 020 8933 0003;
- or by post: Headstone Tennis Club, Hillfield Close, North Harrow, HA2 6AZ.



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.