

## Lichfield Friary Lawn Tennis Club – GDPR Privacy Policy

Lichfield Friary Lawn Tennis Club respects your privacy and is committed to protecting your personal data.

“We” are Lichfield Friary Lawn Tennis Club, our registered office is at Darnford Lane, Tamworth Road, Lichfield, WS14 9JE. We are the data controller for the purposes of the Data Protection Act 2018, the UK GDPR and any other data protection legislation applicable in the UK from time to time. This means that we are responsible for deciding how we hold and use personal information about you. We are required under data protection legislation to notify you of the information contained in this privacy policy.

If you have any questions about our use of your personal data, please contact us using the details set out in paragraph 9 below.

Please note that links on our website may take you to external websites which are not covered by this policy. We recommend that you check the privacy policies of these websites before submitting any personal information to them. We will not be responsible for the content, function or information collection policies of these external websites.

### **1. What personal data do we collect about you and how do we collect it?**

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data). There are certain types of more sensitive personal data which require a higher level of protection, such as information about a person’s health or sexual orientation. Information about criminal convictions also warrants this higher level of protection.

#### ***Information you provide to us***

We may receive personal information about you whenever you:

- contact us (through our website or by phone, text, email or post).
- when you fill in an application for membership,
- When you provide information via the Venue’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 Venue)

This information may include:

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, when 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

We also collect, use and share aggregated data such as statistical or demographic data for any purpose. Aggregated Data could be derived from your personal data but is not considered personal data in law as this data will not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy policy.

We do not collect any sensitive data (known as “*Special Categories of Personal Data*”) about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

This list is not exhaustive, and in specific instances we may need to collect additional data for the purposes set out in this policy.

## **2. How and why do we use your personal information?**

It is necessary for us to use your personal information for the reasons set out in paragraph 1 above. In order for us to process your application to join as a member of our tennis club, hire and use one of our tennis courts or receive any other products or service from us, there is a contract between us and we need to use your personal data in order to perform our side of that contract. Otherwise, we will only use your information in this way where we have a legitimate interest to do so.

Ordinarily, we do not rely on consent as a legal basis for processing data other than in relation to sending marketing communications to you via email or text message. You have the right to withdraw consent at any time by contacting us.

We have set out below, a description of all the ways we may use your personal data, and which of the legal bases we rely on to do so.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us using the details set out in paragraph 9 below if you need details about the specific legal ground on which we are

relying to process your personal data where more than one ground has been set out in the table below.

- 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;
- Research and statistical analysis about who is playing tennis in our Venue;
- Communication about our Venue activities that we think may be of interest to you;
- Storing your details on the software platform we use for our online Venue member management database . 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 Venue's facilities and participation in the game generally);
- Promoting our Venue 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 interest to you.

### ***Marketing***

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising. You can ask us to stop sending you marketing messages at any time by contacting us to amend your preferences, methods of contact and products/services you wish to hear about.

### ***Promotional offers***

We may use your personal data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide if any of our products or services may be relevant for you (we call this marketing).

You will receive marketing communications from us if you have requested information from us or services from us and, in each case, you have not opted out of receiving that marketing.

### ***Third-Party Marketing***

We will get your express opt-in consent before we share your personal data with any company for marketing purposes.

### ***Opting Out***

You can opt-out of any marketing at any point by contacting us using the details set out in paragraph 9 below.

### ***Change of purpose***

We will only use your personal information for the purposes for which we collected it, as set out above, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal information without your knowledge in compliance with the above rules, where this is required or permitted by law.

### **3. Who do we share your personal information with?**

#### ***Sharing your information within our company and group***

If required, we will share your personal data with our staff and volunteers so that we can achieve the purpose for which it was collected.

#### ***Sharing your information with third parties***

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.
- Our contractors and suppliers, including coaches, any provider of membership management services and specifically Microsports Limited.

There are certain exceptional circumstances in which we may disclose your information to third parties. This would be where we believe that the disclosure is:

- Required by the law, or in order to comply with judicial proceedings, court orders or legal or regulatory proceedings.
- Necessary to protect the safety of our staff/volunteers, our property or the public.
- Necessary for the prevention or detection of crime, including exchanging information with other companies or organisations for the purposes of fraud protection and credit risk reduction.
- Proportionate as part of a merger, business or asset sale, in the event that this happens we will share your information with the prospective seller or buyer involved.

### **4. How long do we keep your personal information?**

We will only store your personal information for as long as we need it for the purposes for which it was collected. If you would like more information about exactly how long each

particular piece of your personal data will be stored by us, please contact us using the details set out in paragraph 9 below.

## **5. How do we protect your personal information?**

We will take all steps reasonably necessary to ensure that your personal data is treated securely and in accordance with this policy.

When we transfer any of your personal data via the internet or our website, we try to ensure that it is transferred securely. Unfortunately, the transmission of information via the internet is not completely secure and although we will do our absolute best to protect your personal data, we cannot guarantee its security. We will however use strict procedures and security features to try to prevent unauthorised access to your personal data.

All information you provide to us is stored on secure servers in the UK or the European Economic Area.

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

## **6. What rights do you have in respect of your personal information?**

If you require any further information about your rights as explained below, or if you would like to exercise any of your rights, please contact us using the details set out in paragraph 9 below.

### ***You have the right to be informed***

We have a legal obligation to provide you with concise, transparent, intelligible and easily accessible information about your personal information and our use of it. We have written this policy to comply with this right.

### ***You have the right to access your personal data***

You have the right to ask us to confirm whether or not we hold any of your personal information. If we do, you have the right to have a copy of your information and to be informed of the following:

- Why we have been using your information.
- What types of information we were using.
- Who we have shared the information with.
- How long we envisage holding your information.

In order to maintain the security of your information, we will have to verify your identity before we provide you with a copy of the information we hold. The first copy of your

information that you request from us will be provided free of charge, if you require further copies we may charge an administrative fee to cover our costs.

***You have the right to correct any inaccurate or incomplete personal data***

Where you have requested a copy of the information we hold about you, you may notice that there are inaccuracies in the records, or that certain parts are incomplete. If this is the case you can contact us (using the details set out in paragraph 9 below) so that we can correct our records.

***You have the right to be forgotten***

There may be times where it is no longer necessary for us to hold personal information about you. This could be if:

- The information is no longer needed for the original purpose that we collected it for.
- You withdraw your consent for us to use the information (and we have no other legal reason to keep using it).
- You object to us using your information and we have no overriding reason to keep using it.
- We have used your information unlawfully.
- We are subject to a legal requirement to delete your information.

In those situations you have the right to have your personal data deleted. If you believe one of these situations applies to you, please contact us using the details set out in paragraph 9 below.

***You have the right to have your data transferred to you or a third party in a common format***

Also known as data portability, you have the right to obtain a copy of your personal data for your own purposes. This right allows you to move, copy or transfer your personal data more easily from one IT system to another, in a safe and secure way.

If you would like us to transfer a copy of your data to you or another organisation in a structured, commonly use and machine-readable format, please contact us using the details set out in paragraph 9 below. There is no charge for you exercising this right.

***You have the right to object to direct marketing***

You can tell us at any time that you would prefer that we do not use your information for direct marketing purposes. If you would not like to receive any direct marketing from us, please contact us using the details set out in paragraph 9 below or use the links provided in any of our marketing communications.

***You have the right to object to us using your information for our own legitimate interests***

Sometimes, we use your personal information to achieve goals that will help us as well as you. When we use your information to help us make our organisation better; and when we contact you to interact, communicate or to let you know about changes we are making.

We aim to always ensure that your rights and information are properly protected. If you believe that the way we are using your personal data is not justified due to its impact on you or your rights, you have the right to object. Unless we have a compelling reason to continue, we must stop using your personal data for these purposes.

### ***You have the right to restrict how we use your personal data***

You have the right to ask us to stop using your personal data in any way other than simply keeping a copy of it. This right is available where:

- You have informed us that the information we hold about you is inaccurate, and we have not yet been able to verify this.
- You have objected to us using your information for our own legitimate interests and we are in the process of considering your objection.
- We have used your information in an unlawful way, but you do not want us to delete your data.
- We no longer need to use the information, but you need it for a legal claim.

### ***You have rights related to automated-decision making and profiling***

If we undertake any automated decision-making or profiling it is solely for the purpose of tailoring the information which we provide to you. We will not use automated decision-making or profiling to make any decisions which will have a legal effect upon you or otherwise significantly affect you, and you have the right not to be subject to such decisions. If you have any concerns or questions about this right, please contact us using the details set out in paragraph 9 below.

## **7. Changes to our Privacy Policy**

Any changes we make to our privacy policy in the future will be posted on this page and, where appropriate, notified to you by email. Please check back frequently to see any updates or changes to our privacy policy.

This version was last updated on 1<sup>st</sup> March 2023 and historic versions can be obtained by contacting us using the details set out in paragraph 9 below.

## **8. Complaints**

If you wish to make a complaint about our collection or use of your personal data, please contact us (using the details set out in paragraph 9 below) in the first instance so that we may seek to resolve your complaint.

You have the right to lodge a complaint with the Information Commissioner’s Office (ICO), the statutory body which oversees data protection law in the UK. Please visit the [ICO website](#) if you wish to lodge a complaint with the ICO.

## 9. Contact Us

Our contact details are as follows are:

**Email:** [membership.lftc@gmail.com](mailto:membership.lftc@gmail.com)

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