

# **Sydenham Lawn Tennis & Croquet Club Ltd**

## **Privacy Policy – Members and Non-Members**

### **Who are we?**

This Privacy Policy is provided to you by Sydenham Lawn Tennis and Croquet Club Ltd (trading as Sydenham Tennis Club) (“the Club”) of Lawrie Park Road SE26 6ET which is the data controller for your data.

### **Your personal data – what is it?**

“Personal data” is any information about a living individual which allows them to be identified from that data (for example a name, photographs, videos, email address, telephone number, or address). Identification can be by the information alone or in conjunction with any other information. The processing of personal data is governed by the Data Protection Act 2017, the General Data Protection Regulation 2016/679 (the “GDPR”) and other legislation relating to personal data and rights such as the Human Rights Act 1998.

### **Information that you give us**

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

- Directly from you, when you fill in our membership application forms, activity or event entry forms, coaching forms, or any other online or paper based forms;
- When you make enquiries on our website;
- When you provide information via the Club’s management software or court booking system, or when you interact with us in various other ways (for example, where you enter leagues, ladders and competitions, renew your membership, sign up for a course or lessons);
- When you speak to, phone or email the Club Manager or any Role Holders (employees, workers, independent contractors or volunteers) at the Club;
- From someone else who has applied for membership on your behalf; for example, a family member who has applied for family or partner membership
- From a tennis coach or other relevant person who has provided us with your contact details for applying for membership or using the Club’s services or other similar 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, or in relation to a competition;
- From Kent LTA or North Kent LTA in relation to any inter-club leagues or competitions;
- From images from our CCTV cameras.

### **What data does the data controller process?**

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

- Names, titles and aliases;
- Contact and communications information, including your contact details (including email addresses, telephone numbers and postal addresses) and records of communications and interactions we have had with you);
- Financial information, including Direct Debit details and payment card numbers;
- Certain other information which you volunteer when making use of your membership benefits (for example, when making court bookings, entering leagues or competitions, or making use of other Club facilities);
- Photographs and video footage;
- We may on occasions, if this information is provided by you, process sensitive personal data such as racial or ethnic origin, mental and physical health, details of injuries, medication/ treatment received;
- We may also collect data about your health or medical conditions or those of your child, 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 and to ensure the well-being of you or your child when participating in our coaching activities.

## **How do we process your personal data**

The Club will comply with its legal obligations to keep personal data up to date, to store and destroy it securely and not collect or retain excessive amounts of data. The Club will also keep your personal data secure and protect personal data from loss, misuse, unauthorised access and disclosure and to ensure that appropriate technical measures are in place to protect personal data.

## **How we use collected information**

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.

The Club collects and uses your personal information for the following purposes:

- Administration of your Club membership, including: informing you about court/facilities opening hours, to provide the facility to book courts, and taking membership fees and renewal of membership;
- Fulfilment of orders for goods and services, including court bookings;
- To send members emails with details of news and events about the Club;
- To provide members and non-members with information about activities at the Club, and the services that we provide and changes to our services, by email, post and text message and phone;
- To provide members with the facility to use a league system for tennis, squash and racketball (currently through MyCourts);
- To provide members with the facility to use a ladder system for playing tennis, squash and racketball (currently through TennisRungs);
- To provide members with the facility to book squash courts (currently through MyCourts) and tennis courts (currently through ClubSpark),

- To provide both members and non-members, both adults and children, with the coaching activities that they have subscribed for, including one to one coaching, drop-in sessions, members' team training, community tennis events, holiday camps for children and adult training camps;
- To contact members and non-members, both adults and adults on behalf of their children, regarding coaching activities;
- Storing your details on the software platform we use for our online Club member management database/tennis court booking system (currently through ClubSpark), and for our squash court booking/league system (currently through MyCourts);
- To advise members of activities taking place at the Club which are run by third parties;
- Promoting our Club and promoting goods and services of third parties (for example, equipment suppliers, operators of coaching and other courses, and organisers of tennis events) where we think this will be of interest;
- To send members occasional questionnaires relating to the Club or its services;
- To display information on the Club's website, or on software operated by the Club, of team, tournament, or league results, or events in which members or non-members may have been involved;
- To post information or photographs regarding events in which you may have been involved on the Club website, Facebook, Instagram or X;
- To contact members regarding team and inter-club matches;
- To advise the appropriate sporting bodies of team members' names for the purpose of inter-club matches;
- To provide details of teams and team captains on the Club website;
- To carry out comprehensive safeguarding procedures in accordance with best safeguarding practice from time to time with the aim of ensuring that all children and adults at risk are provided with safe environments;
- To carry out research and statistical analysis about who is using Club facilities;
- To collate information to enable the Club to administer the Club and the website and other software used by the Club;
- To improve customer service. Your information helps us to more effectively respond to your customer service requests and support needs;
- To send members papers regarding Annual General Meetings, Extraordinary General Meetings, or any other meetings of the Club;
- To keep minutes of meetings;
- To produce and circulate to members, and to place on the Club website, lists of role holders, including volunteer members of the Club;
- To utilise CCTV images from our CCTV cameras for the purposes listed below.

## **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 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 news, events and activities at the Club, including venue closures, restricted hours, and changes to policies and procedures.

You are in control of how we communicate with you. You can update your choices and/or your contact details by contacting us at the Club using the contact details at the end of this policy.

## **What is the legal basis for processing your personal data**

### **Consent of the data subject**

For processing some of our data we require your consent and we will require you to sign and return a consent form to us.

For example:

- To send you details of any third party services or products the Club may consider of interest to you;
- To use your photograph on our website or elsewhere at the Club;
- To process any sensitive data, such as regarding your health;
- For other marketing purposes.

### **Processing is necessary for the purpose of a contract with the data subject or to take steps to enter into a contract.**

We will process some data for the purpose of the performance of a contract (including any written terms and conditions relating to your membership) with you;

For example:

- This includes entering into a contract with the Club to become a member and for the Club to provide all benefits associated with membership including court bookings and other goods and services;
- To enable you to book tennis and squash courts;
- To enable you to participate in activities and competitions at the Club.

## **Processing is necessary for compliance with a legal obligation**

Some of our processing is necessary to comply with a *legal obligation*:

For example:

- The Club is required by law to register directors' personal details at Companies House;
- The Club is required by law to send notices to members regarding Annual General Meetings and Extraordinary General meetings;
- To carry out safeguarding procedures for adults and children.

## **Processing is necessary for the club's legitimate interests or a third party except where such interests are overridden by the interests, rights or freedoms of the data subject**

Some of our processing is necessary for the club's *legitimate interests*. We process some data for the Club's legitimate interest in increasing use of the Club's facilities, to carry out the necessary administrative work to run the Club and all activities, and to increase participation in the sports available to play at the Club.

For example:-

- To maintain records of members and their playing levels;
- Storing your details on our software;
- Communications on Club news, events and activities;
- To keep financial records of invoices paid;
- To keep minutes of meetings;
- To collate information to enable the Club to analyse data and improve the Club's services;
- To send questionnaires to obtain your views about the Club's services;
- To collate information regarding teams, leagues, ladders, competitions and results;
- To prepare, publish and circulate lists of volunteers and other role holders on our website and elsewhere at the Club.

## **CCTV**

We currently use CCTV around our site. We believe that such use is necessary for the legitimate interests of the Club or third parties, including:-

- To prevent crime and protect buildings and assets from damage, disruption, vandalism and other crime;
- For the personal safety of staff, members, visitors and other members of the public and to act as a deterrent against crime;

- To support law enforcement bodies in the prevention, detection and prosecution of crime;
- To assist in day-to-day management, including ensuring the health and safety of staff, members, visitors and others;
- To assist in the effective resolution of disputes which arise in the course of disciplinary procedures or grievance proceedings;
- To assist in the defence of any civil litigation, including employment tribunal proceedings;
- To assist in monitoring the safeguarding of children, vulnerable persons and others on Club grounds;
- To assist in monitoring the use of the Club's tennis courts and the Club grounds.

## **Special Category/ Sensitive Data**

We will process some sensitive data, such as medical information where appropriate for both children and adults including members and also non-members undertaking our coaching activities at the Club.

We will process this information with your consent pursuant to Articles 6 and 9(A) of the GDPR as set out in our consent forms but, on occasions, processing will be necessary for the purposes of carrying out the obligations and exercising the specific rights of the controller or of the data subject in the field of employment and social security law or a collective agreement.

## **How we protect your information**

We adopt appropriate data collection, storage and processing practices and security measures to protect against unauthorised access, alteration, disclosure or destruction of your personal information, stored on our website and on other software used by the Club through third party service providers and on our own servers.

## **Sharing your personal information**

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 for the performance of our tasks or where you first gave us your prior consent:

- Our employees, workers, coaches and volunteers, for the purposes of administering your membership and coaching activities and giving you access to the membership or coaching benefits to which you are entitled;
- Our contractors and suppliers and any provider of membership management services;

- ClubSpark – for membership, coaching bookings and tennis court bookings;
- MyCourts – for leagues, tournaments and squash court bookings;
- TennisRungs – for tennis, squash and racketball ladders;
- Survey Monkey for sending out questionnaires;
- Mailchimp for sending out newsletters;
- Lawn Tennis Association ('LTA') – in relation to tennis members registration with British Tennis for competitions and other related issues;
- The LTA, Kent LTA and North Kent LTA - for all issues relating to competitive inter-club leagues;
- England Squash – in relation to registration of squash members for competitive inter-club leagues;
- On occasions with other clubs with which we are carrying out joint activities or events;
- CCTV images that may be shared with the police for security reasons in relevant circumstances – see CCTV Policy for further details.

Please note that your own use of any software or system is subject to the Terms and Conditions and Privacy Policy published on that site.

### **Information which is available to members on software used by the Club**

The Club uses software to run Club competitions, leagues and ladders for tennis, squash and racketball (currently ClubSpark, MyCourts and Tennis Rungs). On the software used by the Club it is possible to access personal identifiable information amongst logged-in members of the Club, including names, email addresses, telephone numbers (where provided by the member), and league and ladder positions and results.

Members will have to give their consent to the Club and separately to use their personal information on this software.

### **How long do we keep your personal data?**

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 Club membership and for a period of six years after your last interaction with us (for accounting, tax reporting and record-keeping purposes).

CCTV images will be retained for a limited period only in accordance with our CCTV Policy.

### **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.

## **Transfer of Data Abroad**

Any electronic personal data transferred to countries or territories outside the EEA will only be placed on systems complying with measures giving equivalent protection of personal rights either through international agreements or contracts approved by the European Union. Our website, our X link, Instagram and Facebook pages are also accessible from overseas, so on occasion some personal data (for example, in a newsletter) may be accessed from overseas. We will not send group Club communications by WhatsApp messages as we cannot guarantee protection for personal rights on data transferred abroad.

## **Third party websites**

Users may find advertising, or other content on our website that link to the sites and services of our partners, suppliers, advertisers, sponsors, licensors and other third parties. We do not control the content or links that appear on these sites and are not responsible for the practices employed by websites linked to or from our website. In addition, these websites or services, including their content



and links, may be constantly changing. These sites and services may have their own privacy policies and customer service policies. Browsing and interaction on any other website, including websites which have a link to our website, is subject to that website's own terms and policies.

## **Photographs**

The Club may take photographs or film events and these may be published on the Club website, social media platforms etc, or be displayed at the Club. We will not display such photographs unless we have the written consent of an adult or written parental permission of a child, to use such photographs. This consent is referred to on our consent forms mentioned above but may be withdrawn.

## **Where we store your personal data**

We store the data that we collect from you on our own secure servers. The Club will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy.

Where you have been given a password which enables you to access parts of our website or any of the other software that is used by the Club to provide services to you, you are responsible for keeping this password confidential. The Club requests that you do not share this password with anyone.

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 your data transmitted to our website or any of other online services: any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to prevent unauthorised access.

CCTV images will be stored in accordance with our separate CCTV Policy.

## **Non-personal identification information**

We may collect non-personal identification information about you whenever you interact with our website. Non-personal identification information may include the browser name, the type of computer and technical information about your means of connection to our website, such as the operating system and the Internet service providers utilised and other similar information.

## **Web browser cookies**

Our website may use "cookies" to enhance you experience. Your web browser places cookies on their hard drive for record-keeping purposes and sometimes to track information about you. You may choose to set your web browser to refuse cookies, or to alert you when cookies are being sent. If you do so, note that some parts of the website may not function properly.

## Changes to this privacy policy

If we wish to use your personal data for a new purpose, not covered by this notice, then we will provide you with a new notice explaining this new use prior to commencing the processing and setting out the relevant purposes and processing conditions. Where and whenever necessary, we will seek your prior consent to the new processing.

## Contacting us

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 the Club Manager at:-

Sydenham Lawn Tennis and Croquet Club Limited  
Lawrie Park Road, Sydenham, London, SE26 6ET

[www.sltcc.co.uk](http://www.sltcc.co.uk)

Email: [info@sltcc.co.uk](mailto:info@sltcc.co.uk)

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).

This policy is reviewed every three years (or earlier if there is a change in national legislation).

Chair: Gillian Bartlett

Welfare Officer: Dez Lewington