

## **Cromer Lawn Tennis & Squash Club**

### **Website Privacy Notice**

**The Purpose** of this privacy notice is to explain how Cromer Lawn Tennis & Squash Club processes personal data to fulfil its data protection responsibilities. The notice covers the activities of the club, referred to hereafter as CTC, by its staff and volunteers. It is primarily directed at club members and those that would like to join, but also includes suppliers and contractors.

**The Role of CTC** in data protection terms is that of a data controller where it determines the purpose and use of personal data collected and is registered with the Information Commissioner's Office (ICO). Once your data has been received it becomes the responsibility of the privacy manager (PM) to ensure that it is processed in accordance with the latest UK data protection legislation. You can contact the PM via email using [admin@chromertennisclub.co.uk](mailto:admin@chromertennisclub.co.uk).

**The personal data processed by CTC** will be basic contact information for the purposes of responding to general enquiries, promoting the club, creating invoices and administering your sporting activities including facilitating coaching and competitions. We will also collect medical data you think is necessary for us to have, but only with your explicit consent and it would only be accessed in a medical emergency by the staff that need it at that time. If we are not given all the required personal data, it may result in an incomplete service being provided.

**CTC's duty of confidentiality** means that our staff will treat your personal data with due respect and in confidence and will only disclose it to those that need to know it (see below). We also expect the same duty of confidentiality of all third parties with whom we share personal data. Sharing is kept to a minimum and reviewed regularly. Personal data, including back-ups, are processed in the UK and the EU.

**We process personal data against a lawful basis** as described below:

- To comply with our legal obligations
- To fulfil our contractual obligations to club members, suppliers and contractors
- To respond to your enquiries (non-members), to promote our services, to arrange coaching and competitions, we will process your personal data in support of our legitimate interests
- When processing for a pre-defined purpose for which your consent has been sought prior to that processing commencing (consent may be withdrawn at any time via the PM) – for club members, this will be requested when you renew your annual membership

**In all cases the processing of your personal data** by CTC shall be in accordance with the principles of data protection, as set out in the UK data protection legislation.

**CTC will share personal data**, only when necessary, with some or all of the following:

- Other club members, but only with your prior permission
- External Accountants when appointed by CTC
- An IT support company that is subject to a data processing agreement
- Sport coaches that are subject to a data processing or data sharing agreement

**CTC follows a retention schedule** to determine the length of time it holds different types of personal data. The retention schedule is shown below:

- For those items of personal data for which members have given their consent at the time of applying to the club or at membership renewal (normally annually), that data will be deleted unless it is re-consented during renewal, but it can be deleted sooner upon request
- For ex-members: routine correspondence in hard copy/ emails will be stored for 7 years after our last contact, although we may seek your consent to retain your personal data at that time

- For non-members: correspondence about casual enquiries in hard copy or in emails will be stored for 7 years after our last contact with you
- Your basic contact data will be held indefinitely but we will process all requests to erase it – as long as there are no overriding justifications to retain it
- By exception, documentation that includes personal data may be retained by CTC beyond the schedule, but only for a specific purpose and only when CTC believes there is a legitimate interest or a legal obligation to do so

**At the end of the retention schedule** CTC will either destroy or delete your personal data and any associated emails or relevant documentation. If it is technically impractical to delete electronic copies of your personal data, it will put it beyond operational use. It should be noted that CTC allows up to 3 months after the retention schedule to complete the action.

**The website uses cookies**, but you have the option to enable the non-essential cookies as well as turn them off again later. For more details, please read the separate cookie statement.

**The website has links** to other websites that may be of interest to you, but please note that CTC is not responsible for the processing of personal data by these websites.

**The UK General Data Protection Regulation defines the rights** that you have (although these do not apply in all situations); for convenience these rights are shown below:

- Right to be informed as to how your personal data is being processed by CTC – this is done through this privacy notice or specific to client privacy notices issued separately
- Right to access your personal data held by us; this is done by making a ‘Data Subject Access Request’ (DSAR) to the PM
- Right to rectification of your personal data if you believe we have collected it incorrectly or it needs to be updated
- Right to erasure of your personal data for which we no longer have a legitimate purpose to process
- Right to restrict processing under certain circumstances, during which time your personal data but will be out of operational use until the related matter is resolved
- Right to data portability of your personal data in a machine-readable version, as you have provided, but this is only applicable to data provided with your consent or under contract
- Right to object to our processing of your personal data for which it does not have a legal or contractual obligation
- Rights related to automated decision making and profiling (however CTC does not use these techniques in its decision making)

**Further details on your data protection rights** and all other aspects of processing personal data, can be found on the Information Commissioner’s Office (ICO) website: <https://ico.org.uk>.

**Raising concerns, exercising rights or making queries** about how we are processing personal data can be done by contacting the PM. Please be aware that we will need to verify your identity before responding fully, therefore, you may be asked for material that, in context, will enable us to confirm it. Alternatively, you have the right to contact the ICO directly.