**GRAFTON TENNIS**

**AND SQUASH CLUB**

**DATA PRIVACY POLICY**

**This document has been updated to reflect the new General Data Protection Regulations (GDPR), effective 25th May 2018**

For the purposes of the General Data Protection Regulation ("GDPR") and UK data protection laws, the Controller is **GRAFTON TENNIS & SQUASH CLUB** (the “Venue”) of **70A THORNTON ROAD, LONDON, SW12 0LF**.

**About this document**

This Privacy Policy sets out the way we process your personal data to make you aware of how we use your data as a member of our club.

**How we collect your information**

We may collect your personal data in a number of ways, for example:

* Directly from you when you fill in an application for membership; when you make enquiries on our website; when you provide information via the Venue’s club management software or court booking systems; or when you interact with us during your time as a member in various other ways (eg. when you enter a competition/tournament; renew your membership; sign up for a coaching lesson etc);
* From someone else who has applied for membership on your behalf (eg. a family member or your tennis coach who has provided us with your contact details for that purpose);
* From the LTA/England Squash (eg. when the LTA/England Squash 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 eg. your name, email address(es), telephone numbers, and records of communications and interactions we have had with you;
* Financial information, including direct debit details;
* Certain other information which you volunteer when joining eg. student status, for student membership, and date of birth (for certain memberships).

**How we use your 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
	+ Written terms and conditions relating to your membership;
	+ Informing you about court/facilities opening hours;
	+ Taking payment of membership fees;
	+ Providing access to the court booking system;
	+ Providing access to other member’s details through the secure Member’s Directory.
* Administration of Venue tournaments, competitions and leagues;
* Administration of the Wimbledon ballot, including sharing your personal data with the LTA in relation to tickets;
* Research and statistical analysis about who is playing tennis and squash in our Venue eg. for legitimate purposes of advertising externally to increase membership and participation in tennis and squash generally;
* Communication about the Venue activities that we think may be of interest to you;
* Storing your details on the software platform that we use for court bookings – please note, your own use of the software is subject to the Terms and Conditions and Privacy Policy published on that site;
* Photos of individuals may be used to promote the club activities on the external Venue website;
* Promoting goods and services of third parties, only where we think this will be of interest to you eg. sport equipment suppliers/offers; operators of coaching courses; operators of tennis and squash events;
* External and internal audit and record-keeping purposes;
* Sharing your personal data with the LTA/England Squash, county tennis and squash associations and other venues for reasonable purposes in connection with the operation of the Venue.

**The basis for processing your information**

We may process your personal data for the above purposes because:

* it is necessary for the performance of a contract with you (ie. your membership contract) or in order to take steps at your request prior to entering into such a contract;
* we have your specific or, where necessary, explicit consent to do so;
* it is required in order for us to comply with our legal obligations.

**Who has access to your data**

Only certain committee members, or club volunteers with a bonafide club purpose, have access to your data.

**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 may include:

* Records of transactions, such as payment receipts or direct debit confirmations as applicable;
* Membership related mailings such as your membership renewal reminders, notices of formal meetings, information about Venue opening and closing times, information about tournaments and leagues as applicable.

**You are in control of how we communicate with you. You can update your choices and/or contact details directly on the club management software and court booking system. If you need advice or assistance, please contact:**

**Email:** **graftonmembership@gmail.com**

**Sharing your information with others**

We do not sell or share your personal data with third parties to use other than as set out below:

* Other Venue volunteers, for the purposes of administering your membership and giving you access to the membership benefits to which you are entitled (eg. tournament entries; Wimbledon ballot; coaching).
* To the LTA/England Squash and county tennis and squash associations, for the purposes of administering your participation in inter-club/county tennis and squash 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 (6) 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 information (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 rights, you may contact Murray Sutton, Club Chairman:

* by email: info@graftontennisandsquash.com;
* by telephone: 020 8673 2891;
* or by post: c/o Grafton Tennis and Squash Club, 70A Thornton Road, London, SW12 0LF.

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 available at [www.ico.org.uk](http://www.ico.org.uk).