

## **PRIVACY POLICY – Gunnersbury Triangle Club**

### **Governance**

Gunnersbury Triangle Club (hereafter “the Club”) endeavours to act at all times in compliance with the requirements of the EU ‘General Data Protection Regulation’ or any other successor regulation, (“GDPR”).

### **Purpose**

This Privacy Policy governs the manner in which the Club deals with personal information collected from members of the Club in accordance with the GDPR. It applies to information regarding the way it is collected, used, recorded, stored and destroyed, irrespective of whether the information is held in paper or electronic form. This Privacy Policy applies to all services offered by the Club.

### **How the Club collects Personal Data**

The Club collects Personal Data if you voluntarily submit such information to the Club. You can always refuse to supply Personal Data, however, it may prevent you from using the full range of services the Club has to offer.

You provide this data by filling out any of the Club Application Forms including, but not limited to, online membership applications, competition, league, coaching, and other event entry forms.

Personal Data can be given by someone else on your behalf (for example a family member).

You may also give Personal Data to the Club when you use other internet applications or software used by the Club such as LTA’s ClubSpark or any other software used by the Club for leagues, court bookings, coaching, membership or other purposes.

### **Personal Data**

Personal data includes (but not limited to):

- full name
- date of birth
- gender
- postal address
- email address
- telephone numbers
- medical conditions
- experience levels
- consents

### **Use of Personal Data**

The Club may use your information for the following (but not limited to):

- administering your application to become a member;
- collecting payments from you for subscriptions or other fees;
- processing court bookings via ClubSpark;
- organising, providing and running sporting events, activities, tournaments and competitions;
- administrating the Wimbledon ballot;
- collecting statistical information about the membership mix of the Club;

- helping improve our membership services;
- analysing how members are making use of the Club facilities;
- emailing you news and events related to the Club;
- sending you notifications for courses, holiday camps, clinics, etc.;
- sending you occasional surveys relating to the Club;
- reminding you of membership renewals;
- sending you invitations to Annual General Meetings or any other Club meetings;
- notifying you about changes or updates to the Club;
- informing you of team, tournament, or league results;
- notifying you of names of committee members, staff employed at the Club, contractors and volunteers (including team captains);
- responding to your requests, enquiries or support needs.

### **Storage of Personal Data**

The Club uses the secure LTA-approved ClubSpark system as the primary platform on which we hold our membership database and on-court bookings. ClubSpark is registered as a data controller with the Information Commissioner's Office (ICO) and is GDPR compliant. Their latest registration certificate is available upon request: [support@clubspark.co.uk](mailto:support@clubspark.co.uk)

### **Access to your Personal Data**

Personnel related to the Club who have access to ClubSpark are:

- Membership Secretary
- Bookkeeper
- Coaching staff

### **Your individual rights**

At any time, you may verify and amend what personal data the Club hold about you. You will be able to edit and update your details by signing into ClubSpark and navigating to their Profile page. At the point of registration on ClubSpark, you will be asked to 'Opt-in' to various consents (Photographs, Newsletter and Contact List only for competition and match play). You have the right to change your consents at any time under 'Your Privacy and Consents' in your Profile. You can also contact [membership@gunnersburytriangleclub.org.uk](mailto:membership@gunnersburytriangleclub.org.uk) to notify about any changes to your membership record.

### **Retention of Personal Data**

If you leave the club, the Club will retain your membership record and any of your Personal Data from the ClubSpark database only for as long as deemed necessary. You may also contact the Membership Secretary to have your contact details deleted upon request.

### **Sharing your Personal Data**

The Club will not sell, trade, or rent Personal Data to others. It may use the data to generate generic aggregated demographic information and share such information with our business partners, trusted affiliates and advertisers for statistical purposes. The Club may use third party service providers to assist in its administration activities, such as sending out newsletters or surveys. The Club may share your Personal Data with these third parties for those limited purposes.

## **Non-members**

The Club may run competitions or social events which are open to non-members. We do not collect Personal Data but non-members are expected to sign the visitor/guest book at the Club.

## **Children**

Children between the ages of 0 and 18 years old joining the Club require an online junior membership form to be completed by the parent/guardian who will become the Main Contact. The Club does not offer or participate in any online services such as social media to children under 18 years old. Communications concerning the child/junior will be through the Main Contact.

## **Security**

ClubSpark have implemented technology and policies to safeguard your privacy from unauthorised access and improper use. You can find out about this on their privacy policy: <https://clubspark.lta.org.uk/PrivacyPolicy>.

Any payment transactions will be encrypted. Some areas of ClubSpark use third-party software facilities such as GoCardless. Please note that, data storage on the GoCardless system, and the communication between GoCardless and the worldwide banking networks, is regularly audited by the banking authorities to ensure a secure transaction environment. They also ensure that they stay up-to-date with the latest versions of any third-party code used, and continually review their own proprietary code.

Where you have chosen a password which enables you to access your account on ClubSpark, you are responsible for keeping this password confidential. We ask you not to share your password with anyone.

## **Data security breach**

In the event that Personal Data is stolen, lost or damaged it is the Club's responsibility to report any data security breach to either the local police or the ICO (Information Commissioners' Office) within 72 hours upon discovery.

If a breach of data security happens, including, but not limited to the loss or theft of a tablet or phone containing member data, the Club has a Data Protection Security Checklist in place. Where a breach is likely to result in a high risk to the rights and freedoms of an individual, such as loss of confidentiality, those concerned will be notified directly, including the ICO. In the event of a less serious breach, the member(s) will be informed and the rest of the data secured.

## **Changes to this Privacy Policy**

The Privacy Policy will be reviewed as it is deemed appropriate by the Gunnersbury Triangle Club Management Committee (or if legislation changes). The Club may update this Privacy Policy from time to time to reflect changes in the law. We encourage you to check this Privacy Policy for changes whenever you revisit our website—[www.gunnersburytriangleclub.org.uk](http://www.gunnersburytriangleclub.org.uk). You can also view the latest update on our Club notice board.

## **Data controller**

The Club is not required to have a registered data controller with the ICO. It is the Club Secretary who will act in this role supported by the Chairman and Membership Secretary.

**Contacting us**

If you have any questions about this Privacy Policy please contact us at:

Gunnersbury Triangle Tennis Club

[info@gunnersburytriangleclub.org.uk](mailto:info@gunnersburytriangleclub.org.uk)

*This document was last updated on 10 May 2018.*