

NEWLANDS LAWN TENNIS CLUB

PRIVACY POLICY

Introduction

For the purposes of the General Data Protection Regulation ("GDPR") and UK data protection laws, the data controller is Newlands Lawn Tennis Club "the Club" (or "NLTC", "we", "our", "us") of 18 Mochrum Road, Glasgow, G43 2QE.

NLTC is a Community Amateur Sports Club, registered with HM Revenue and Customs ("HMRC") and is subject to the GDPR with effect from 25 May 2018.

We are committed to protecting your privacy and this privacy policy sets out the way we process your personal information. We have created this privacy policy to make sure you are aware of how we use your personal information dependent on whether you interact with us as a Member, a coach, an employee, a volunteer, a visitor, a Member's guest or other customer, as a user of our website or in some other way.

This privacy policy gives a general overview of how the Club processes personal information but you may receive more detailed information about data protection (including separate privacy notices) depending on the different ways you interact with us.

We may change this policy from time to time by updating this page. You should check this page from time to time to ensure that you are content with any changes.

How we collect your personal information

We may collect your personal information in a number of ways, principally:

- Directly from you when you fill in an application for Membership, when you make enquiries on our website, when you provide information via the Club management software or MyCourts booking system or when you interact with us during your time as a Member of the Club in various other ways (eg. where you enter a competition, renew your Membership, sign up for coaching lessons);
- From someone else acting on your behalf, (eg. when a parent or guardian has applied for Membership for you as their child, when a ticket buyer names you as their guest at a Club event, when a coach or official provides performance or results data to the Club on behalf of a player, or when Club staff who are working with you in your capacity as a player, coach or official record information about you, such as when co-ordinating competitions);

- On rare occasions, we may receive information about you from others who are not acting on your behalf (eg. where someone makes a complaint about you which we then investigate); and
- When we may be required to share personal information with statutory or regulatory authorities and organisations to comply with statutory obligations. Such organisations include the Health & Safety Executive, Disclosure Scotland, and Police Scotland for the purposes of safeguarding children and other vulnerable persons. We may also share personal information with our professional and legal advisors for the purposes of taking advice.

We also collect certain personal data by automated means, including about visitors to the Club using CCTV monitoring.

The types of personal information we collect

The Club collects and processes a range of personal information about you. This includes:

- Contact and communications information, including your name and contact details (such as your postal address(es), email address(es) and telephone number), and including a parent's or guardian's contact details (eg. for Members who are children, where Club communications are sent to their parent), and records of communications and interactions we have had with you by various means, and other basic information including your date of birth and gender;
- CCTV footage and other information obtained through electronic means such as door entry access cards and images in photographic form; and
- Certain other information which you volunteer when making use of your Membership benefits (eg. when making court bookings, tournament entries or making use of other NLTC facilities and Wimbledon ballot entries).

We may also collect information about your health or medical conditions, where you have volunteered this (eg. so that we can cater for you when you attend a club social event or other activity).

For coaches we collect information including:

- Their accreditations, qualifications and training;
- Evaluations and assessments of players and matches;
- Disclosure Scotland checks, where applicable; and
- Disciplinary and safeguarding information, where relevant.

How we use your personal information

Personal information 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 information for the following purposes:

- Administration of your Club Membership, including:
 - Informing you about court/facilities opening hours;
 - Taking payment for Membership fees;
- Administration of the Wimbledon ballot;
- Fulfilment of orders for goods or services , including court bookings;
- Providing NLTC Members with contact details (name, phone number, email, membership category) of other Members to facilitate team and social match play. This information must not be used for any other purpose by Members (eg. but not limited to, making commercial offers, promoting business interests or charitable activities);
- Communication about Club news and activities that we think may be of interest to you;
- Where this is necessary for the performance of a contract (including any written terms and conditions relating to your Membership) with you;
- Research and statistical analysis about who is playing sport at the Club;
- Storing your details on the software platform we use for our online Club Member database/MyCourts booking system. Please note that your own use of this system is subject to the Terms and Conditions and Privacy Policy published on the MyCourts website; and
- Where this is necessary for our legitimate interests (see below).

If your personal information is included in any images taken by us at our competitions and events, we may share this with the sports' governing bodies/local press/on the Club noticeboards, website and social media for promotional purposes.

The Club has legitimate interests in processing personal information about individuals we interact with. There are many such interests, including commercial interests and those with a wider public benefit. In essence, our principal legitimate interests are in pursuing our aim to get more people playing our sports more regularly and administering the Club in a way that promotes and safeguards the integrity of our sports. We may need to process personal information in pursuit of our legitimate interests in order to:

- Organise competitions and major events;
- Market the Club's products and services (including tickets, performance and participation programmes, coaching courses and events), and promote our sports more generally;
- Ensure the security of Club events and premises, including by recording individuals' photographs as part of event accreditation processes and capturing individuals' images using CCTV monitoring;

- Keep appropriate records of coaches, officials and volunteers; and
- Administer our performance programme (for example, monitor player progress or make player selection decisions).

Where the Club relies on legitimate interests as the legal basis for processing personal data, it has considered whether or not those interests are overridden by the interests or fundamental rights or freedoms of the persons whose data are being processed and concluded that the processing is, on balance, fair.

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. However, there are some communications 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 the Club. Examples of these essential service communications include:

- Records of transactions, such as payment receipts or confirmations;
- Membership related mailings such as your Membership renewal reminder, notices of General Meetings and information about club closures and holiday opening hours.

You are in control of how we communicate with you. You can update your choices and/or your contact details by logging on to the MyCourts system and changing your preferences. Also, you can contact us at:

- Telephone : 0141 632 1742
- Email: reception@nltc.co.uk
- Post: 18 Mochrum Road; Glasgow, G43 2QE.

Sharing your information with others

We do not sell or share your personal information for other organisations to use other than as set out below. Personal information collected and processed by the Club may be shared with the following third parties, where necessary:

- Our employees and volunteers, for the purposes of administering your Membership and giving you access to the Membership benefits and services to which you are entitled;
- Our contractors and suppliers, including coaches, and any provider of Membership services, court booking and website services should we install such services;
- Someone acting on your behalf, (eg. a parent or guardian who has purchased Membership for you as their child);
- Competition organisers and officials involved in competitions you are taking part in;

- The Lawn Tennis Association and Scottish Squash as our sports governing bodies;
- Police, law enforcement and security services and similar bodies (to assist with the investigation and prevention of crime and the protection of children and vulnerable persons), HM Revenue & Customs (for tax reporting purposes), and
- Former employers and other providers of necessary background checks.

How long we retain your information

We retain your personal information only for as long as is necessary and the duration will depend on the type of information and the reason why we collected it. For most Membership information, 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 the Club (for accounting, tax reporting and record-keeping purposes).

On expiry of the relevant retention period, your personal data will be deleted.

Personal information collected about job applicants, current and former employees

Recruitment

All of the personal information you provide during the recruitment process will only be used for the purpose of progressing your application and we will not share any of the information you provide during the recruitment process with any third parties. The information you provide will be held securely by us whether the information is in electronic or physical format.

When applicable, we will use the contact details you provide to us to contact you to progress your application. We may also ask you about your previous experience, education, referees and for answers to questions relevant to the role you have applied for. We will use the information you provide to assess your suitability for the role you have applied for.

If you are unsuccessful following assessment for the position you have applied for, we may ask if you would like your details to be retained for a reasonable period.

Employment

If we make a conditional offer of employment we will ask you for information so that we can carry out pre-employment checks. We will need to confirm the identity of our staff, their right to work in the United Kingdom and seek assurance as to their trustworthiness, integrity and reliability.

You will therefore be required to provide proof of your identity and proof of any relevant qualifications. We may contact your referees, using the details you provide in your application, directly to obtain references.

If we make a final offer, we will also ask you for the following:

- Bank details (to process payroll payments);
- National insurance number and tax codes for use with HMRC; and
- Emergency contact details (so we know whom to contact in case you have an emergency whilst working at the Club).

During your employment with us we will collect and store information in your personnel file which may include performance reviews and leave records.

Retention of employee personal information

If you become a member of the Club's staff the information you provide during the application process will be retained by us as part of your employee file for the duration of your employment plus 6 years following the end of your employment.

If you are unsuccessful at any stage of the process, the information you have provided until that point, and our interview notes will be retained for 6 months from your application.

Who we share our employees' personal information with

We share our employees' personal information with our accountants for preparing payroll, with HMRC and, where appropriate, with our pensions provider. We may also disclose specific personal information about you if required by law, government request or court order if, based on our good faith belief, it is necessary to conform or comply with such law, request or court order.

If you do not provide personal information

In some cases described above, the provision of personal information is a contractual requirement, and/or a statutory requirement if you wish to engage with the Club in a certain way (eg. where you wish to work as a Club coach or employee, and there is a statutory requirement for us to carry out a criminal records check on you, for safeguarding purposes). In those and other cases, if you do not provide us with certain personal information, we may not be able to work with you or provide our products or services to you (as applicable), or it may adversely affect the provision of our services to you.

Making contact via our website

You may choose to raise a query with us via the contact forms provided on our website. In such a case we will collect and store your name, telephone number and email address.

Cookies

Information may be sent to your computer in the form of an internet “cookie” to allow the Club servers to monitor your requirements. The cookie is stored on your computer. The Club server may request that your computer return a cookie to it. These return cookies do not contain any information supplied by you.

This is necessary to allow the Club to measure the usability of the systems, which will help to improve the user experience of our websites. Your browser software should however enable you to block cookies if you wish to.

Links to other websites

Our website may contain links to other websites of interest. However, once you have used these links to leave our website, you should be aware that we do not have control over these other websites. Therefore, we cannot be responsible for the protection and privacy of any information which you provide whilst visiting such websites and such websites are not governed by this privacy policy. We advise that you should exercise caution and look at the appropriate privacy policy applicable to the websites being visited.

Your rights

Under the GDPR, you have the right to:

- Request access to your personal information (commonly known as a “data subject access request”). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it;
- Request correction of personal information 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 information. This enables you to ask us to delete or remove personal information where there is no good reason for us to continue to process it. You also have the right to ask us to delete or remove personal information where you have exercised your right to object to processing (see below);
- Request us to restrict our processing of personal information activities in certain circumstances;
- Object to the processing of your personal information, on grounds relating to your particular situation;
- Request the transfer of your personal information to another party: and
- Withdraw your consent, where our processing is based on your previous consent, without affecting the lawfulness of our processing based on consent before its withdrawal.

If you would like to exercise any of these rights, please contact us in writing at Newlands Lawn Tennis Club, 18 Mochrum Road, Glasgow, G43 2QE. Please note that the above rights are not absolute, and we may be entitled (or required) to refuse requests where exceptions apply.

Contact and complaints

If you have any queries about this privacy notice or how we process your personal information, you may contact us at:

- Telephone : 0141 632 1742
- Email: reception@nltc.co.uk
- Post: Newlands Lawn Tennis Club, 18 Mochrum Road; Glasgow, G43 2QE.

If you are not satisfied with how we are processing your personal information, 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.

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