

DATA PRIVACY AND GDPR POLICY

1. Introduction

1.1 'The Limpsfield Club' (operating as Limpsfield Lawn Tennis Club {hereinafter referred to as "LLTC"}) is a Private Members Club "...run by members for the benefit of members..." and is overseen by a Main Committee (who are themselves members & volunteers). The Main Committee co-ordinates with Sports Section sub-committees to assist them in running LLTC and the Main Committee engages paid staff who work on the day-to-day basis to operate & oversee the Club's administration

2. About this Policy

- 2.1 This policy explains how, why and where LLTC collects personal information about members/nonmembers (course attendees) and staff / coaches, how we use the information, why we need the information and where the information is kept and your rights.
- 2.2 We reserve the right to amend this Data Privacy and GDPR Policy from time to time and we will notify members via notices displayed in the Club House and / or via email.
- 2.3 We will always aim to comply with current General Data Protection Regulation (GDPR) when dealing with personal data. Further information on GDPR can be found on the website of the Information Commissioner (www.ico.gov.uk)
- 2.4 For the purposed of GDPR :-
- 1.4.i) Members/staff/coaches are '**Data Subjects**'
 - 1.4.ii) LLTC will act as '**The Control**' and will '**Process**' '**Data Subjects**' information.
 - 1.4.ii) Staff Only - LLTC's appointed accountant will '**Process**' '**Data Subjects**' information for the purpose of remuneration via payroll

3. What information will be collected and why?

MEMBERS AND NON MEMBERS WHO ATTENED COURSES

Type of Information	Purpose	Legal basis of processing
Full name Address Telephone number/s Email address	<p>To manage members membership. To send invoices and notifications regarding membership renewals, subscription charges, court / floodlight fees and coaching fees.</p> <p>To keep members informed of club events and forthcoming committee meetings (if they consent) by email newsletter.</p> <p>To verify members identity</p> <p>To enable LLTC to contact members if there are any sudden changes to bookings and / or courses, etc</p>	<p>For the purposes of our legitimate interests in operating the Club (LLTC)</p> <p>Completed and signed membership agreements form part of a membership contract.</p> <p>Nonmember/course attendees to create course registers and for Safeguarding considerations</p>

	To register nonmembers onto course run by LLTC, age is required for Junior courses to determine staff ratios for safeguarding.	
Date of birth	To determine which category of membership members are eligible to join. To calculate staff ratios when needed for safeguarding	To ensure correct membership fees are charged. To ensure Safeguarding regulations are adhered to.
Bank Details Direct Debit Mandates	To manage Member's membership and to collect the appropriate fees associated with the membership and that of any associated dependents. For payment of courses attended by nonmembers . Direct Debit mandates will be completed with all necessary banking information for the purpose of scheduled payments for membership and / or associated activities and fees by Direct Debit.	Members using Direct Debit as a payment method will be covered by the Direct Debit Guarantee through their banking institutions.
Gender	For the provision of adequate gender specific facilities for members. Staff ratios and safeguarding.	Legitimate interest in providing adequate facilities for all members.
Emergency Contact Details Medical Information Gym-Lite Par Q	To contact next of kin in case of emergency Club staff to be aware of any medical conditions that may affect a member's participation and /or information needed for specialist responders during an emergency. Gym-Lite Par Q – to ensure Gym members are aware of any participation hazards associated with any existing medical conditions/injuries.	To protect the vital interests of members in case of emergency. Sensitive information will have restricted access
Photography/ Video Consent	For the purpose of Membership Card identification. Photographic images may be used on	Consent will be required for members images to be used.

	LLTC marketing material and feature on the website and / or social media.	To safeguard the identity of individuals.
Members Club Directory via ClubSys and on noticeboards	<p>Existing Members (as of May 2018) are responsible for setting their own preferences on ClubSys to make visible only the information they wish to allow other members to see for the purpose of arranging matches / games</p> <p>Consent will be required from all new members for any personal information to appear on noticeboards throughout the Club House.</p> <p>Members information will only be available for the purpose of contacting other members to arrange matches/games.</p>	<p>The onus will be on members to make available what information they desire.</p> <p>Section heads and captains will require consent to forward any members information.</p> <p>All 'mass' correspondence will be via the LLTC Office and the Club Management as the 'Controller' under GDPR</p>
CCTV	CCTV is in use throughout the Club House and grounds of LLTC	CCTV is in use for the sole purpose of safety and security of members and staff.

STAFF AND COACHES

Type of Information	Purpose	Legal basis of processing
Full name Address Telephone number/s Email address	For the purpose of employment at LLTC and the formation of employment contracts - this applies to both contracted and freelance staff.	To comply with Employment Law and the right to work in the UK. DBS Checking criteria
Date of birth	To ensure that staff receive the correct payment band according to their age.	Comply with National Minimum and Living Wage structure DBS Checking criteria
Bank Details	To pay staff salaries / wages or for the payment of freelance staff invoices by BACS.	Payment as per employment contracts
National Insurance Number	For the purpose of employment at LLTC and the formation of employment contracts and for the appropriate payment of taxes/ NI	To comply with Employment Law and the right to work in the UK. HMRC Regulations

	contributions/pensions via HMRC.	DBS Checking criteria
Copy of Passport and/or Birth Certificate	For the purpose of employment at LLTC and the formation of employment contracts - this applies to both contracted and freelance staff. Proof of identity	To comply with Employment Law and the right to work in the UK. DBS Checking criteria
Gender	For the provision of adequate gender specific facilities for staff. Staff ratios and safeguarding.	Legitimate interest in providing adequate facilities for all staff. DBS Checking criteria
Emergency Contact Details Medical Information Gym-Lite Par Q – if applicable	To contact next of kin in case of emergency Club staff to be aware of any medical conditions that may affect a staff when at work and /or information needed for specialist responders during an emergency. Gym-Lite Par Q – to ensure Gym users are aware of any participation hazards associated with any existing medical conditions/injuries.	To protect the vital interests of staff in case of emergency. Sensitive information will have restricted access
Photography/ Video Consent	For the purpose of Membership Card / Staff identification. Photographic images may be used on LLTC marketing material and feature on the website and / or social media.	Consent will be required for staff images to be used.
Qualifications and References	For the purpose of suitability for employment at LLTC and the formation of employment contracts - this applies to both contracted and freelance staff.	To comply with job descriptions and to ensure that staff are competent to work in their specific role.

4. How We Protect your Data

- 4.1 **Members / Nonmembers - course attendees:** All information gathered will solely be used for the purpose of administering and management of membership to LLTC in accordance with the membership application agreement and acceptance of the Clubs Membership Terms and Conditions and Club Laws and Bye Laws and for the running of courses for nonmembers.
- 4.2 **Staff:** All information gathered will solely be used for the purpose of administering and management of employment contracts with LLTC and associated remunerations payments via invoice and payroll.

- 4.3 No information will be transferred outside of the Club to any third parties and will not leave the EU.
- 4.4 LLTC holds a valid Secure Socket Layer (SSL) Certification which ensures all data moving between Office PC's, servers and cloud storage will be encrypted. Daily backups aim to further protect all data.
- 4.5 LLTC provides free Public WiFi for customers – this is also covered under the SSL Certificate.
- 4.6 Please note, however, that where information and data is sent to LLTC via the internet this cannot be guaranteed to be 100% secure.
- 4.7 Access to members data in ClubSys and staff personnel files is restricted to those staff who administer and manage the memberships only. The Club Manager will determine the access level for each member of staff.
- 4.8 All members and staff will be notified as promptly as possible in the event of any breach of security.
- 4.9 Paper copies of signed membership agreements and Direct Debit mandates are stored in a locked office and will be destroyed by shredding if and when required to do so – see point 4.
- 4.10 Staff information is kept in a locked filing cabinet in the Club House. The LLTC's accountant responsible to payroll will keep staff information in a secure manner.
- 4.11 All communications will be sent via the office to ensure GDPR compliance.
- 4.12 LLTC has CCTV cover areas within the club and the grounds – images are only reviewed in the interest of safety and security of members and staff. The system works on a continuous loop and images are only stored for short period of time

5. How long do we keep your membership information ?

- 5.1 We will hold members personal data in electronic form or hard paper copy as long as member holds a valid membership (this will include personal data of all dependents related to any one membership) and is paying the appropriate subscription fees.
- 5.2 Nonmember information – as long as they are enrolled on any courses. We will seek consent to hold basic information in order to keep non members up to date on future courses.
- 5.3 In the event that a member does not wish to continue their membership all data (electronic and hard paper copies will be deleted / destroyed after 6 months.
- 5.4 However, LLTC will request permission from all exiting members to retain some personal data, such as:
Name, address, contact phone number and email address in order to periodically communicate with ex members, primarily by email, to keep them updated on club developments and / or membership promotions. This will be reviewed annually. If permission is not granted – all information will be deleted/destroyed after 6 months.
- 5.5 All financial information (members and staff) will be securely destroyed once the information has been used and is no longer required.
- 5.6 CCTV – images are recorded on a continuous loop and are not kept unless copies are required for an incident at LLTC
- 5.7 In the event that the staff contract is terminated by either party, all records must be kept for a minimum of 6 years, ID for foreign Nationals – 2 years. Pension Documentation – 6 years.

6. Your Rights

- 6.1 Under GDPR all members / customers have the following rights :-

- 5.1.i) To access your personal data held by LLTC
- 5.1.ii) To be provided with information on how your personal data is processed
- 5.1.iii) To have your information updated / amended as requested

- 5.1 iv) To have your personal data removed / deleted in certain circumstances
- 5.1.v) To object to or restrict how your personal data is used and processed
- 5.1.vi) To have your personal data transferred to yourself – in an easily usable format

5.2 You have the right to complain about how LLTC uses and processes our personal data to the Information

Commissioner :

Website : <https://ico.org.uk/concerns/>

Telephone : 030 123 1113

Postal Address : Information Commissioner's Office,
Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF.

The Limpsfield Club: Should you have any questions or concerns please contact :

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