

KENILWORTH TENNIS, SQUASH AND CROQUET CLUB PRIVACY AND DATA PROTECTION POLICY

1. About this Policy

- 1.1. This policy explains when and why Kenilworth Tennis, Squash and Croquet Club (“we” or the “Club”) collect personal information about our Members, how we use it and how we keep it secure and your rights in relation to it.
- 1.2. We may collect, use and store your personal data, as described in this Data Protection Policy and as described when we collect data from you.
- 1.3. We reserve the right to amend this Data Protection Policy from time to time without prior notice. You are advised to check our website (www.ktscc.co.uk) regularly for any amendments (but amendments will not be made retrospectively).
- 1.4. We will always comply with the General Data Protection Regulations (GDPR) when dealing with your personal data. Further details on the GDPR can be found at the website for the Information Commissioner (www.ico.gov.uk). For the purposes of the GDPR, we will be the “controller” of all personal data we hold about you, and our General Manager is our Data Protection Manager.

2. Who are we?

- 2.1. We are Kenilworth Lawn Tennis & Squash Club Limited, trading as Kenilworth Tennis, Squash & Croquet Club. We can be contacted at:

KTSCC, Crackley Lane, Kenilworth, CV8 2JS Tel No. 01926 852673 Email:

info@ktscc.co.uk

Questions, comments and requests regarding this privacy policy are welcomed and should be addressed to info@ktscc.co.uk.

3. What information we collect and why

Type of information	Purposes	Legal basis of processing
Member's name, telephone number(s), e-mail address(es).	Managing the Member's membership of the Club.	For the purposes of our legitimate interests in operating the Club.
Date of birth / age related information	Managing membership categories which are age related	For the purposes of our legitimate interests in operating the Club.
Gender	Provision of adequate facilities for members.	For the purposes of our legitimate interests in making sure that we can provide sufficient and suitable facilities (including changing rooms and toilets) for each gender.
The Member's name, contact numbers and e-mail address	Creating and managing the Club's Membership Directory and to provide relevant information to our member (and previous members)	The Member may withdraw their consent at any time by contacting us by e-mail or letter to tell us that they no longer wish their details to appear in the Membership Directory.
The Member's email address	To provide relevant information via emails about the Club	The Member may opt-out of receiving emails from the Club by clicking the unsubscribe link at the bottom of the email.

4. How we protect your personal data

- 4.1. We will not transfer your personal data without your consent.
- 4.2. We have implemented generally accepted standards of technology and operational security in order to protect personal data from loss, misuse, or unauthorised alteration or destruction.
- 4.3. Please note however that where you are transmitting information to us over the internet this can never be guaranteed to be 100% secure.

- 4.4. For any payments which we take from you online we will use a recognised online secure payment system.
- 4.5. We will notify you promptly in the event of any breach of your personal data which might expose you to serious risk.

5. Who else has access to the information you provide us?

- 5.1. We will never sell your personal data. We will not share your personal data with any third parties without your prior consent (which you are free to withhold) except where required to do so by law or paragraph 5.2 below.
- 5.2. We may pass your personal data to third parties who are Club representatives, service providers, agents and subcontractors to us for the purposes of completing tasks and providing services to you on our behalf (e.g. manage the Club database and send you mailings). However, we disclose only the personal data that is necessary for the third party to deliver the service and we have a contract in place that requires them to keep your information secure and not to use it for their own purposes.

6. How long do we keep your information?

- 6.1. We will hold your personal data on our systems for as long as you are a member of the Club, for a period of 24 months after you have ceased to be a member and for as long afterwards as is necessary to comply with our legal obligations. We will review your personal data every year to establish whether we are still entitled to process it. If we decide that we are not entitled to do so, we will stop processing your personal data except that we will retain your personal data in an archived form in order to be able to comply with future legal obligations e.g. compliance with tax requirements and exemptions, and the establishment exercise or defence of legal claims.

7. Your rights

7.1. You have rights under the GDPR:

- (a) to access your personal data
- (b) to be provided with information about how your personal data is processed
- (c) to have your personal data corrected
- (d) to have your personal data erased in certain circumstances
- (e) to object to or restrict how your personal data is processed
- (f) to have your personal data transferred to yourself or to another business in certain

circumstances.

7.2. You have the right to take any complaints about how we process your personal data to the Information Commissioner: <https://ico.org.uk/concerns/> 0303 123 1113.
Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow,
Cheshire, SK9 5AF

Approved by General Committee 17 April 2018.