



Surbiton Racket & Fitness Club Members & General User Data Protection Policy & Privacy Notices

For the purposes of the General Data Protection Regulation ("GDPR") and UK data protection laws, the data controller is Surbiton Racket & Fitness Club Ltd (the "Club") of Berrylands, Surbiton, KT5 8JT.

About this document

This data protection policy and privacy notice sets out the way we process your personal data. We've created this privacy policy to make sure you are aware of how we use your data as a member or user of our Club.

How we collect your information

We may collect your personal data in a few limited ways, namely:

- Directly from you, when you fill in an application for a membership contract, when you make enquiries on our website, when you provide information via the Club's booking system (MyCourts), or when you interact with us during your time as a member in various other ways (for example, where you enter a competition, renew your membership, sign up for a course, tournament, event or lessons);
- From someone else who has applied for membership contract on your behalf (for example a family member in relation to a partner or family membership.)
- From the LTA (for example, where the LTA passes on your details to us in connection with a complaint or query you have raised about our Club).
- When you browse the Club's website, you do so anonymously. Personal information including your email address is not collected. Where we ask for your name, email and postal address on certain forms on this site we promise to use it only where we need to get back to you - such as to answer a question. You will not be added to any mailing list without your express permission.

The types of information we collect

We may collect the following types of personal data about you:

- Contact and communications information, including your contact detail. This includes email address(es), Date of birth, telephone numbers, postal address(es), photo for membership card, and records of communications and interactions we have had with you). For the purpose of your membership we use the lawful basis of contract to hold this data.
- Financial details (for Direct Debits only.) financial details are held securely and for the purpose of processing your membership under the lawful basis of contract.
- Certain other information which you volunteer when making use of your membership benefits (for example, when making court bookings, signing in guests or making use of other Club facilities).
- Data about your health or medical conditions, specifically in the form of a PAR Q form for gym usage, or where you have volunteered this information, for example so we can cater for you when you attend a Club social event. Medical information will be stored securely and is held by us on the lawful basis of vital interest.

How we hold your personal data

The Club will hold the information collected above electronically on the following systems through our data processors. The data is encrypted and stored securely in line with the data processors own privacy notices;

- ESP leisure limited- Club membership and management system
All the personal information mentioned above to be used in relation to your specific membership contract. The data is held by us on the lawful basis of contract and is in line with ESP's own privacy policy.
- MyCourts (HBI consulting Ltd)- Club booking and tournament administration system
All the personal information mentioned in relation to your membership contract, held on the lawful basis of contract. The data is held in line with Mycourts own privacy policy which can be viewed by logging into your MyCourts account. Members control their own preferences including;
 - visibility of contact details to other logged in members (found in privacy settings)
 - email consent for receiving club information emails and e-newsletters (found in email settings)
 - automated MyCourts notification (found in email settings)
- Mailchimp- E-newsletter software
Name and email address held in line with Mailchimp's privacy policy, only for sending Club e-newsletters. We will send information that we feel is necessary for the

club to function, anything that is related to the Clubs primary purpose/ objectives under the lawful basis of legitimate interest. You have the right to unsubscribe from this at any time.

How we use 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.

The following data is collected, stored and processed under the lawful basis of contract:

- Administration of your Club membership contract including:
 - informing you about court / facilities opening hours;
 - managing your membership on ESP;
 - processing payments using our accounting computer system
 - notification and communication in relation to essential aspects of membership of the Club, including but not limited to membership renewals, club annual general meetings, club events and activities.
 - Fulfilment of orders for goods and services, including court bookings;

The following data is collected, stored and processed under the lawful basis of legitimate interest. The information is processed in the pursuit of our legitimate interests to promote and encourage participation for all ages and abilities in all club events and activities.

- Administering tournaments and events. The club has the right to all tournament results, individuals do not have the right to requested deletion
- Administration of the Wimbledon ballot
- Research and statistical analysis about who is using our Club
- Communication about our Club activities and events
- Filming and photographing club events and activities for use on social media, the club website, leaflets and posters.
- Promoting our Club and promoting goods and services of third parties (for example, equipment suppliers, operators of coaching courses, and organisers of related sporting or social events).

Where we process your personal information in the pursuit of our legitimate interests you have the right to object to the Club using your personal information for the above purposes. We will send information that we feel is necessary for the club to function, anything that is related to the Clubs primary purpose/ objectives or promote and encourage participation/ usage for any of our activities. You have the right to unsubscribe or opt out from communications from us in relation to our legitimate interests at any time.

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 Club. Examples of these essential service communications are:

- Records of transactions, such as payment receipts or Direct Debit confirmations (as applicable).
- Membership contract related mailings such as your renewal reminder, notices of formal meetings (including AGM) and information about venue 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 contacting us at:

Contact: Jess Starkey

Telephone: 0208 399 1594

Email: jess@surbiton.org

Post: Jess Starkey, Surbiton Racket & Fitness Club, Berrylands, KT5 8JT

Sharing your information with others

We do not sell or share your personal data for other organisations to use other than as set out below.

Personal data collected and processed by us 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 to which you are entitled.
- Our data controllers for the purpose of membership management services
- Our contractors and suppliers, including self employed coaches and personal trainers. This information will only be shared if we gain your consent to do so.

All 3rd parties have their own privacy policies in place for holding and processing this information. These are fully compliant, have been shared with us and are available on their websites.

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 Club membership contract and for a period of six years after your last interaction with us (for accounting, tax reporting and record-keeping purposes). On cancellation of your membership you will be removed from our emailing list and will no longer receive any communication from us.

Website and cookies

When you browse our website information may be sent to your computer in the form of an Internet "cookie" to allow the website to monitor your requirements. The cookie is stored on your computer. The server may request that your computer return a cookie to it. These return cookies do not contain any information supplied by you or any personally identifiable information about you.

Such measures are necessary to allow us to measure the usability of the systems, which will help in its continuing development to ensure that we understand the requirements of our users. Your browser software should however enable you to block cookies if you wish to. For more information about cookies, please visit www.allaboutcookies.org.

CCTV

The Club has CCTV in operation for the purpose of security, crime detection and the health and safety of the users of the Club, whether members, guests or staff.

Clear signage is displayed around the site to inform that CCTV is operation. Images are recorded and encrypted when stored on a secure hard drive with password protection.

Screens displaying live or recorded footage will only be viewed by authorised individuals and are situated in a secure office.

Footage will be stored for 30 days for crime detection purposes and after this point will be permanently deleted.

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 CCTV footage of images where you are present. If supplying this footage the Club will not disclose any personal data of another data subject apart from the requester.
- 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, your right to be forgotten. 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 data (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 legal rights, you may contact Jess Starkey, Data administrator:

- by email: jess@surbiton.org;
- by telephone: 020 8399 1594;
- or by post: Jess Starkey, Surbiton Racket & Fitness Club, Berrylands, KT5 8JT

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: www.ico.org.uk.