



**PIT FARM TENNIS CLUB,  
HILLIER ROAD,  
GUILDFORD,  
SURREY GU1 2JQ  
Tel: 01483 562148  
[www.pitfarmtennis.co.uk](http://www.pitfarmtennis.co.uk)**

## **Data Protection Policy & Procedures**

**Introduction:** Pit Farm Tennis Club (PFTC) is committed to a policy of protecting the rights and privacy of individuals. PFTC needs to collect and use certain types of data in order to carry out the business of the Club. This personal information will be collected and dealt with appropriately.

**General Data Protection Regulations (GDPR) May 2018** - governs the use of information about people (personal data).

Personal data can be held on registration system, computers, laptops, web site, mobile devices or in a manual file. This will include emails, texts messages, minutes of meeting and photographs. PFTC will be the data controller for all information held. The Committee/ volunteers will be personally responsible for processing and using personal information in accordance with GDPR.

Committee members and volunteers who have access to personal information will be expected to read and comply with this policy.

**Purpose:** The purpose of this policy is to set out the Club's commitment and procedures for protecting personal data. PFTC regards the lawful and correct treatment of personal information as very important to successful working, and to maintaining the confidence of those with whom we deal with.

**GDPR:** contains certain principles for processing personal data with which we must comply:  
Personal data:-

Shall be processed fairly and lawfully and, in a transparent manner in relation to the data subject.

Shall be collected for specified, explicit and legitimate purposes, and shall not be further processed in a manner that is incompatible with those purposes.

Shall be adequate, relevant and limited to what is necessary in relation to those purposes for which data is processed.

Shall be accurate and where necessary, kept up to date. All reasonable steps will be taken to ensure that personal data that are inaccurate are either erased or rectified without delay.

Shall not be kept for longer than necessary for the purposes for which the personal data are processed.

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Company Registration No:

Club Captain: Mr Iain Brown



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Shall be kept secure by PFTC (Data Controller) who takes appropriate technical and other measures to prevent unauthorised or unlawful processing or accidental loss or destruction of, or damage to, personal information

Personal information = information about living individuals that enables them to be identified i.e. names, addresses, telephone numbers, email addresses, NI number.

**Responsibilities:** PFTC is the Data Controller under GDPR, and is legally responsible for complying with GDPR, which means that it determines what purposes personal information held will be used for. PFTC will ensure that it is properly implemented, and will through strict application of criteria and controls:

- Observe conditions regarding fair collection and use of information
- Meet legal obligations to specify purposes for which the information is used
- Collect and process appropriate information to the extent that it is required to fulfil its operational needs or to comply with legal requirements
- Ensure quality of information used
- Ensure the rights of people about whom information is held, can be fully exercised under GDPR, Including:-
  - Right to be informed that processing is being undertaken
  - Right of access to one's personal information
  - Right to prevent processing in certain circumstances
  - The right to correct, rectify or block information regarded as incorrect
  - Take appropriate security measure to safeguard personal information
  - Ensure personal information is not transferred abroad
  - Treat people fairly without prejudice when dealing with requests for information
  - Ensure response to requests for information is dealt with in a timely manner

The Data Protection Officer for Pit Farm Tennis Club is: Sarah Williams – Club Secretary  
Contact:

PFTC Club Secretary will have overall responsibility for ensuring this policy is implemented ensuring:-

Anyone processing personal information understands their responsibilities for following good data protection practice.

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Anybody wanting to make enquiries about handling personal information knows what to do.  
Deal promptly with any enquiries regarding handling personal information.  
Will review at regular intervals the way it holds, manages and uses personal information.  
Regularly assess and evaluate its methods and performance in relation to handling personal information.

Personal data held is up to date, removing old or out dated information.

All Committee members and volunteers are aware that a breach of the rules and procedures identified in this policy may lead to action being taken against them, ultimately resulting in expulsion from the Club. Any breaches or loss of personal data must be reported to the Club Secretary immediately.

We may update this privacy notice from time to time. When we change this notice in a material way, we will update the version date at the bottom of this page. For significant changes to this notice we will try to give you reasonable notice unless we are prevented from doing so. Where required by law we will seek your consent to changes in the way we use your personal information.

**Data Collection: Informed Consent:** Informed consent is when a Data Subject understands why information is required, who it will be shared with, possible consequences of them agreeing or refusing proposed use of the data and then gives their consent.

PFTC will ensure data collected is within the boundaries defined in this policy. This applies to data that is collected via member registration forms, via Love Admin (online registration system) or by completing a form for payroll/reimbursement/expenses or payment purposes.

When collecting data, PFTC will ensure that the Data Subject:-

Clearly understands why the information is required.

Understands what it will be used for and what the consequences are should the Data Subject decide not to give consent to processing.

As far as reasonably possible, grants explicit consent, via positive opt in for data to be processed.

Is as far as reasonably practicable, competent enough to give consent and has given so freely without any duress.

**Procedures for Handling Data & Data Security:** PFTC Committee and volunteers must ensure that personal data is dealt with properly no matter how it is collected, recorded or used. This applies whether the information is held on paper, computer, portable devices or recorded by other means.

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Personal data relates to data of living individuals who can be identified from that data i.e. names, addresses, email address etc. Identification by data means, combining a number of data information and not just by name alone.

It is important that all PFTC committee, volunteers and members with access to personal data consider any information, which is not otherwise in the public domain, that can be used to identify an individual as personal data and observe the following guidance:-

**Email:** consider if incoming/outgoing email should be kept as an official record. If retained it should be stored/saved to an appropriate folder or printed and stored securely. Original emails should be deleted from mailbox and any “deleted items” box, either immediately or when it has ceased to be of use.

**Phone Calls:** can lead to unauthorised use or disclosure of personal information:- if you receive a phone call requesting any personal information or confirmation thereof regarding one of its members direct the phone call to the Club Secretary

**Laptops/Portable Devices:** must be password protection and have suitable encryption programmes. Do not leave devices unattended in public places. If possible keep with you at all times whilst travelling ensuring device is locked.

**Data Security/Storage:** Store as little personal data as possible on your computer/laptop, only keep essential information. Save information securely, delete where necessary.

Information will only be stored for as long as it is needed or required by statute and will be disposed of appropriately.

**Passwords:** Do not use passwords easy to guess. Ideally passwords should be 6 + characters long, contain upper and lower case letters, numbers and or special characters. Protect your password.

**Information Regarding Committee Members, Members, Coaches, Volunteers or Former of the above:** Information on the above in the form of Membership Forms, contact details, qualifications shall be kept manually and as required by our Affiliation body Surrey LTA Should a member resign from the Club the personal data held will be stored for 6 years (or less ) and will then be responsibly disposed of (shredded).

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**Risk Management:** the consequences of breaching Data protection can cause harm or distress to service users if their information is released to inappropriate people, or they could be denied a service to which they are entitled. GSFC committee and volunteers should be aware that they can be personally liable if they use members personal data inappropriately. This policy is designed to minimise the risks and to ensure that the reputation of GSFC is not damaged through inappropriate or unauthorised access and sharing.

**Data Protection – Data Controller – Information and Processes:-**

Pit Farm Tennis Club requires certain personal data to carry out the business of the Club.

**Information we require from Members, including children:-**

Name/address/email address/contact number/DOB/ emergency contact numbers

**Pro Coaches/Coaches/Employees:** Name/address/contact numbers/NI numbers/references/Qualifications/work history/DBS check

**COVID 19 Information:** due to current conditions and regulations we shall be collecting data to comply with the Governments Track & Trace policy:

<https://www.gov.uk/guidance/nhs-test-and-trace-how-it-works>

Pit Farm Tennis Club will be keeping a register of attendance of all members and visitors attending the Club whether taking part in tennis activities or carrying out works/services for the Club. This information will be held on the online booking system for tennis activities (members must book to attend any activities at the Club), or via a record kept by the Clubhouse & Grounds Manager. This information will be held on the system for the requisite time, or longer as necessary by current guidelines.

**Why we require this information:-**

To carry out the business of the Club. To keep an up to date and accurate register of members in both adult and junior sections of the Club. To comply with our affiliated body – the LTA and Government guidelines (COVID19).

For emergency contact details.

To keep members informed of all Club activities, including training, matches, competitions, Club news, additional sessions and social events. This will be via email, primarily sent using our online system Love Admin.

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To Comply with the Governments Track & Trace policy with regards COVID19. Information will be used should members become ill or contract COVID19 whilst attending Pit Farm Tennis Club organised/social events, or providing works/services to the Club, to inform local authorities in order they may complete the Track & Trace procedures as stipulated by the Government.

For some of your personal information you will have a legal, contractual or other requirement or obligation for you to provide us with your personal information. If you do not provide us with the requested personal information we may not be able to admit you as a member or we may not be able to properly perform our contract with you or comply with legal obligations and we may have to terminate your membership. For other personal information you may not be under an obligation to provide it to us, but if you do not provide it then we may not be able to properly perform our contract with you.

Where you have given us your consent to use your personal information, you have the right to withdraw this consent at any time, which you may do by contacting The Club Secretary.

Please note however, that the withdrawal of your consent will not affect any use of the data made before you withdrew your consent and we may still be entitled to hold and process the relevant personal information to the extent that we are entitled to do so on bases other than your consent. Withdrawing consent may also have the same effects as not providing the information in the first place, for example we may no longer be able to provide certain member benefits to you.

**Disclosure of your personal data** - we share personal information with the following parties when required:

To any governing bodies or regional bodies for the sports covered by our club: to allow them to properly administer the sports on a local, regional and national level (limited data)  
The Government or our regulators: where we are required to do so by law or to assist with their investigations or initiatives.

Police, law enforcement and security services: to assist with the investigation and prevention of crime and the protection of national security.

Limited data = name/address/gender/DOB/email contact.

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### **How do we gather/store the information:**

All members are invited to join the Club by completing an online membership request form via our website: [www.pitfarmtennis.co.uk](http://www.pitfarmtennis.co.uk)

Members details will be stored on the Clubs online Membership Site – Love Admin, where certain data will be required. Members will be sent an email from the site, once membership is confirmed requesting personal data.

Members may enter as much personal data as they wish to be kept on the site, which is a secure site and adheres to current regulations. Love Admin's privacy policy can be found:- <https://www.loveadmin.com/privacy-policy/>

Members may wish to Opt out of receiving information from Pit Farm Tennis Club, they need to do so via email to the Membership Secretary who will then remove any emails addresses from the Love Admin system.

Members are now able to pay Membership fees via the Love Admin site, this is powered by the Company Gocardless. A secure site complying with current regulations under the "substantial public interest conditions" of Schedule 1 of the UK Data Protection Act 2018.

Gocardless privacy policy can be found:

<https://gocardless.com/privacy/merchants/>

Pit Farm Tennis Club do not hold members bank account details and are unable to access these via either Love Admin or Gocardless.

The Treasurer will keep personal data of all employees or sub contract coaches for payroll & HMRC reporting purposes. Data will be limited to name, address, DOB, gender, NI number.

The Treasurer will keep certain banking details for Coaches/Committee Members/Volunteers for the purpose of payment of services or reimbursing expenses. Only those details given to the Treasurer by the individual will be kept on the system. Details can be deleted at any time via a request to the Club Treasurer.

### **Who has Access to personal data:**

The Club Secretary, Membership Secretary, Junior Membership Secretary, Chairperson, Treasurer and Head Coach has access to personal data

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Committee members may use other means of storing personal data i.e. password protected computer or mobile devices for the purposes of Club activities only and for communication purposes of club activities i.e. matches, social events, meetings, & others.

**Who is responsible for up-to-date/accurate information:**

The Club Secretary/Pit Farm Committee will be responsible for holding accurate records of personal data for all members.

Pit Farm Tennis Club will not be responsible for Data Protection of personal information held on systems outside of Pit Farm, but Pit Farm Tennis Club will request Data Protection policies and assurances of safe, secure systems being used when information on its members are being used.

**Retention/Deletion of Personal information:**

Personal data information will be held for all current members. The Club shall retain personal data information on resigned members for 6 years. This period is required as a re-joining member is exempt from an additional joining fee if re-joining the Club within 5 years. After that time period all personal information shall be deleted and be non-recoverable.

Manual records for Coaches/Managers/Volunteers will be held for a term of 6 years (or less) following their resignation from the Club. After that time all personal data held will be disposed of in a responsible manner, typically shredded.

The Club will from time to time publish articles of news and or photographs on its website, names of individuals will not be published.

The Club will from time to time send out via email, articles that may be of interest offered by third parties, i.e. The LTA & others but limited to the Club's business activities.

The Club will NOT release any personal data to third parties for marketing use or other at home or abroad. Personal data cannot under any circumstances be transferred to another service provider. All personal data held at Pit Farm Tennis Club will be for the sole use of running its business activities.

Version July 20.

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