



**PIT FARM TENNIS CLUB, HILLIER
ROAD, GUILDFORD,
SURREY GU1 2JQ Tel:
01483 562148
www.pitfarmtennis.co.uk**

Data Protection & Privacy Policy & Procedures

Introduction: Pit Farm Tennis Club is committed to a policy of protecting the rights and privacy of individuals. The club is required to collect and use certain types of data 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 systems, computers, laptops, web sites, mobile devices or in a manual file. This will include emails, texts messages, minutes of meetings and photographs. Pit Farm Tennis Club will be the data controller for all information held. The Committee/ co-opted members and volunteers will be personally responsible for processing and using personal information in accordance with GDPR.

Personal information = information about living individuals that enables them to be identified i.e., names, addresses, telephone numbers, email addresses, NI number and not just by name alone.

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

Purpose: This policy will set out the Club's commitment and procedures for protecting personal data. The club 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, 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 is inaccurate is either erased or rectified without delay.
- Shall not be kept for longer than necessary for the purposes for which the personal data is processed.

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Club Captain: Mrs Bridget Parker



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- Shall be kept secure by Pit Farm Tennis Club (Data Controller) who takes appropriate technical and other measures to prevent unauthorized or unlawful processing or accidental loss or destruction of, or damage to, personal information.

Responsibilities: The Data Controller is legally responsible for complying with GDPR. Determines what purposes personal information held will be used for, will ensure that it is properly implemented, 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 measures to safeguard 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: The Club Secretary

Contact: pitfarmsec@gmail.com

Under data protection legislation, data subjects have the right, on written request to the club secretary, to obtain a copy of the personal data that the Club holds about them. The data subject has the right to obtain:

- confirmation as to whether or not their personal data are being processed.
- access to copies of their specified personal data.
- additional information (processing, data retention, rectification/erasure all as above).

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Any doubts regarding the identity of the member making a request will result in the club secretary requesting ID. All requests will be logged and responded to within 1 month of the request.

The club secretary has overall responsibility for ensuring this policy is implemented ensuring: -

- Anyone processing personal information understands their responsibilities, following good data protection practice.
- Anybody 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, co-opted members and volunteers are aware any breach of rules/ procedures identified in this policy may lead to action being taken against them, 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. Where required by law we will seek your consent to change the way we use your personal information.

Data Collection: Informed Consent: Data Subject understands why information is required, who it will be shared with, consequences of them agreeing or refusing proposed use of the data, giving consent.

The club will ensure the data collected is within the boundaries defined in this policy. This applies to data collected via the Clubs online registration system or by completing a form for payroll/reimbursement/expenses or payment purposes.

When collecting data, the club 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 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.

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Procedures for Handling Data & Data Security: The committee, co-opted members and volunteers will ensure personal data is dealt with properly regardless of the media on which those personal data are stored, e.g., electronically, paper or on other materials/devices.

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

Email: consider whether incoming/outgoing email should be kept as an official record. If retained, it should be stored/saved in 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 unauthorized 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, always keep with you whilst travelling ensuring the 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 as long as needed or required by statute and will be disposed of appropriately.

Passwords: Passwords should be 6 + characters long, containing upper- and lower-case letters, numbers, and 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 electronically, 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 (if paper shredded, or online deleted).

Risk Management: 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, cop-opted members and volunteers should be aware that they can be personally liable if they use members personal data inappropriately. This policy is designed to minimize the risks and to ensure that the reputation of Pit Farm Tennis Club is not damaged through inappropriate or unauthorized access and sharing.

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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/medical information.

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

In case of a pandemic: additional data may be required to comply with Government policy and our affiliated body, the LTA. Procedures for this will be communicated to all members of the Club should the situation arise.

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.

For emergency contact details.

To keep members informed of all club activities, including training, matches, competitions, club news, additional sessions, and social events. Primarily sent using our online registration system.

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.

Where you have given 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.

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

- Governing or regional bodies for the sports covered by our club: to allow them to properly administer the sports at 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.

Migration of Data: Pit Farm Tennis Club, from time to time, may review its online registration system to evaluate if the system is fit for purpose or requires an upgrade. Should this situation arise all/any new systems will be thoroughly investigated to ensure compliance with GDPR legislation with secure and robust security, and that it meets the needs of the club as identified. A Migration Policy/timeline will be put in place prior to any transfer of data and will include data security prior to migration (ensuring no loss of data), testing of a new system, transference of data, launching the new system. Members will be informed of any new system the club initiates.

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

Members' details will be stored on the clubs online Membership Site, Clubspark, 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.

Clubspark privacy policy: <https://sportlabs.zendesk.com/hc/en-us/articles/206614316-Data-Protection-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 email addresses from the online registration system.

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Membership fees paid via the online registration site; this is powered by Go cardless. A secure site complying with current regulations under the "**substantial public interest conditions**" of **Schedule 1 of the UK Data Protection Act 2018**.

Go cardless privacy policy can be found:

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

Pit Farm Tennis Club does not hold members' bank account details and are unable to access these via either the online registration system or Go cardless.

The Treasurer will keep the personal data of all employees or subcontract 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 request to the Club Treasurer.

Who has Access to personal data:

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

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 and members will be responsible for accurate records of personal data on members.

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

Retention/Deletion of Personal information:

Personal data information will be held for all current members. Retention of personal data on resigned members is 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 non-recoverable.

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Manual/electronic 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 (if paper or deleted if held electronically).

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

The club will from time to time send out 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 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.

February 2025.

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