

GIFFNOCK TENNIS SQUASH & HOCKEY CLUB PRIVACY POLICY

1. Introduction and about us

This privacy notice explains how Giffnock Tennis Squash & Hockey Club (“GTSHC”) or, as applicable, Giffnock Tennis Club or Giffnock Squash Club or Giffnock Hockey Club – collectively referred to in this privacy notice as “the Club” (or “we”, “our”, “us”) – collects, uses and shares your personal data.

How we use your personal data depends on whether you interact with us as a Member, a player, a coach or official, a volunteer, a visitor, a Members guest or other customer, as a user of our website (www.giffnock-ltc.co.uk) or in some other way. This privacy notice gives a general overview of how the Club processes personal data but you may receive more detailed information about data protection (including separate privacy notices) depending on the different ways you interact with us.

GTSHC, which is an unincorporated association, is the primary ‘data controller’ of your personal data for the purposes set out below. The Club is subject to the General Data Protection Regulation (the “GDPR”) with effect from 25 May 2018.

2. The categories of personal data we collect

The Club collects and processes a range of information about you. This includes, for virtually all individuals, your name and contact information (such as your home and/or business address (as applicable), email address and telephone number, and including a parent’s or guardian’s contact details (for example, for Members who are children, where Club communications are sent to their parent)), records of communications and interactions we have had with you by various means, basic biographical information including your date of birth and gender (where relevant) and financial information including bank account details (used for accepting payments from you or making them to you, as applicable).

In addition, we will collect the following categories of personal data depending on how you interact with us:

For Members:

- Membership details;
- Wimbledon ballot entry;
- Rankings and ratings;
- Competitions entered;
- Ticket information for events;
- NUS number/student details (if applicable); and/or

- Responses to surveys.

For customers including ticket buyers:

- Delivery address for products or services, including purchased tickets;
- Payment information and details of returns or refunds, where relevant; and/or
- Dietary requirements, access requirements and proof of ID, where relevant for attending Club events.

For players:

- Performance, match-play and training-related data;
- Rankings and ratings;
- Dietary requirements and other information relevant for training or competition arrangements;
- Medical records and injury information; and/or
- Anti-doping and disciplinary information, where relevant.

For coaches and officials:

- Accreditations, qualifications and training;
- Availability, selection and travel information;
- Evaluations and assessments of players and matches;
- PVG information (criminal records checks), where applicable; and/or
- Disciplinary and safeguarding information, where relevant.

For volunteers:

- Records of activity such as volunteer role(s), length of service, awards and number of hours;
- Application or registration details for the purposes of volunteering;
- Reference checks;
- Disciplinary and safeguarding information, where relevant; and/or
- Availability information.

For website users:

- Login ID information, including usernames; and/or

- Information provided through our website, including in messages and forms, for example forms for updating communication and marketing preferences.

Our administration of the Club may also require us to process special category data (including data relating to racial or ethnic origin, political opinions, religious beliefs, trade union membership, health and sexual life) and/or data relating to criminal convictions and offences (together “sensitive personal data”).

3. How we collect personal data

We may collect your personal information in a number of ways, principally:

- Directly from you, for example when you apply for Membership, purchase our products or services including tickets, attend Club events, enter a competition, join a performance programme as a player, provide coaching or officiating services, and make enquiries on our website, and when you interact with us during your participation in the Club in various other ways;
- From someone else acting on your behalf, for example when a parent or guardian has purchased Membership for you as their child, when a ticket buyer names you as their guest at a Club event, when a coach or official provides performance or results data to the Club on behalf of a player, or when Club staff who are working with you in your capacity as a player, coach or official record information about you, for example when coordinating competitions;
- On rare occasions, we may receive information about you from others who are not acting on your behalf (for example, where someone makes a complaint about you which we then investigate);
- By creating it ourselves, for example when we produce match reports from watching players compete at events; and/or
- When you make enquiries on our website, or when you interact with us (for example, where you volunteer to assist with a competition, tournament or league organised by us, sign up for our volunteer communications, enquire about a volunteering opportunity), or through the club annual registration process and when your details are passed to us for the purposes of volunteer recognition.

We also collect certain personal data by automated means, including about visitors to the Club using CCTV monitoring.

4. Our basis for processing personal data and the purposes for which we use it

Performance of contracts. The Club will process your personal data where this is necessary for the performance of a contract with you, or to take steps at your request before entering into such a contract. For example, we need to process personal data in order to comply with the terms and conditions of membership with Members, other

terms and conditions relating to the purchase of products or services including tickets, funding and player support agreements with players, services contracts with coaches and officials, volunteer agreements and the terms and conditions applicable to the use of our website.

Compliance with our legal obligations. In some cases, the Club needs to process your personal data in order to comply with its legal obligations. For example, we need to process personal data in order to comply with health and safety legislation, carry out PVG (criminal records) checks on coaches, officials and volunteer roles (where relevant) for safeguarding purposes, report certain tax information about our financial arrangements with third parties to HM Revenue & Customs and assist with investigations by police and/or other competent authorities.

Legitimate interests. In other cases, the Club has 'legitimate interests' in processing personal information about individuals we interact with. We have many such interests, including commercial interests and those with a wider public benefit. In essence, our principal legitimate interests are in pursuing our mission to get more people playing our sports more often and administering the Club in a way that promotes and safeguards the integrity of the sport. For example, we need to process personal data in pursuit of our legitimate interests in order to:

- organise competitions and major events;
- market the Club's products and services (including tickets, performance and participation programmes, coaching courses and events), and promote our sports more generally;
- ensure the security of Club events and premises, including by recording individuals' photographs as part of event accreditation processes and capturing individuals' images using CCTV monitoring;
- operate a customer services team, conduct surveys and seek advice from advisers with the aim of improving the Club and our sports as a whole;
- keep appropriate records of coaches, officials and volunteers;
- administer our performance programme (for example, monitor player progress or make player selection decisions);
- structure the Club, storing most personal data centrally and making use of certain software and/or cloud storage providers for the purposes of efficient, fast and secure access to personal data; and
- research and statistical analysis (for example into volunteering practices and patterns).

Where the Club relies on legitimate interests as the legal basis for processing personal data, it has considered whether or not those interests are overridden by the interests or fundamental rights or freedoms of the individuals whose data are being processed and concluded that the processing is, on balance, fair.

Consent. The Club may also process your personal data on the basis of consent you give, for example to send you certain direct marketing communications.

Processing special categories of data. Where we process sensitive personal data, other legal bases for processing may apply, including where our processing is necessary for the establishment, exercise or defence of legal claims (for example, to protect and/or defend our property or rights, or those of other Club stakeholders), for reasons of substantial public interest (for example, to conduct research about player performance), for provision of medical care and treatment, for the purposes of equal opportunities monitoring or where you have otherwise given us your explicit consent (for example, to allow the use of performance players' medical records for performance monitoring purposes, or to share those records with another sports organisation, or where coaches or officials provide us with data relating to criminal convictions and offences as part of the PVG disclosure process).

5. Who we may share your data with

Personal information collected and processed by the Club may be shared with the following recipients, or categories of recipients, where necessary:

- Someone acting on your behalf, for example a parent or guardian who has purchased Membership for you as their child;
- Our employees and volunteers (as applicable), for the purposes of providing particular products or services to you;
- Competition organisers and officials involved in competitions you are taking part in;
- (Where you are a volunteer) with our employees and other volunteers, for the purposes of volunteer management and administration and any volunteering application or project; and to arrange your accreditation for an event;
- The Lawn Tennis Association, Scottish Squash Limited and Scottish Hockey Union as our sporting governing bodies;
- Our contractors and suppliers, where they process personal data on our behalf (for example, IT consultants and hosted software providers and professional providers), as well as third parties we use to help us provide Club participation programmes;

- The Protecting Vulnerable Groups scheme, and safeguarding committees and ‘umbrella bodies’ (for the purpose of carrying out criminal records checks on coaches and officials and others where relevant), HM Revenue & Customs (for tax reporting purposes), the police and/or other competent authorities, as applicable; and
- Former employers and other providers of necessary background checks.

Typically, the Club will not transfer your personal data to countries outside the European Economic Area (EEA). On the limited occasions when this does occur (for example, because your personal data is stored on an IT system hosted outside of the EEA), we ensure that any such transfer meets the requirements of GDPR, for example because it is necessary for the provision of our products or services to you or for the establishment, exercise or defence of legal claims; or is otherwise subject to prescribed safeguards such as ‘model clauses’ approved by the European Commission. You can obtain more details of the protection given to your personal data when it is transferred outside the EEA by contacting us using the details below.

6. How long we will store your data

We may retain your personal data for as long as is necessary to fulfil the purposes set out in this privacy notice and/or the Club’s reasonable requirements. On expiry of the relevant retention period, your personal data will be deleted, suppressed or anonymised, as applicable, save as may be required by our sporting governing bodies.

7. Your rights in relation to your personal data

Under the GDPR, you have the right to:

- obtain access to, and copies of, the personal data that we hold about you;
- require us to correct the personal data we hold about you if it is incorrect;
- require us to erase your personal data in certain circumstances;
- require us to restrict our data processing activities in certain circumstances;
- receive from us the personal data we hold about you which you have provided to us, in a reasonable format specified by you, including for the purpose of your transmitting that personal data to another data controller;
- to object, on grounds relating to your particular situation, to any of our particular processing activities where you feel this has a disproportionate impact on you; and
- where our processing is based on your consent, you may withdraw that consent, without affecting the lawfulness of our processing based on consent before its withdrawal.

If you would like to exercise any of these rights, please contact us in writing using the contact details below. Please note that these rights are not absolute and we may be entitled (or required) to refuse requests where exceptions apply.

If you are not satisfied with how we are processing your personal data, you can complain to the Information Commissioner's Office (ICO). You can also find out more about your rights under the GDPR (and other data protection legislation) from the Information Commissioner's Office website available at: www.ico.org.uk.

8. If you do not provide personal data

In some cases described above, the provision of personal data is a contractual requirement, and/or a statutory requirement if you wish to engage with the Club in a certain way (for example, where you wish to work as a Club coach or official, and there is a statutory requirement for us to carry out a criminal records check on you, for safeguarding purposes). In those and other cases, if you do not provide us with certain personal data, we may not be able to work with you or provide our products or services to you (as applicable), or it may adversely affect the provision of our services to you.

9. Cookies

Information may be sent to your computer in the form of an Internet "cookie" to allow the Club servers to monitor your requirements. The cookie is stored on your computer. The Club server may request that your computer return a cookie to it. These return cookies do not contain any information supplied by you.

This is necessary to allow the Club to measure the usability of the systems, which will help to improve the user experience of our websites. Your browser software should however enable you to block cookies if you wish to.

Contact us

If you have any queries about this privacy notice or how we process your personal data, you may contact us:

- by email: president@giffnock-ltc.co.uk
- or by post: Data Protection, Giffnock Tennis, Squash & Hockey Club, 21 Eastwoodmains Road, Giffnock, Glasgow, G46 6QD, United Kingdom

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