

TWLTC Privacy Policy



For the purposes of the General Data Protection Regulation ("GDPR") and UK data protection laws, the controller is Tunbridge Wells Lawn Tennis Club ("TWLTC") (the "Club") of Nevill Gate, Warwick Park, Tunbridge Wells, Kent TN2 5ES. TWLTC is a not for profit unincorporated association.

1. About this document

1.1 This Privacy Policy together with our membership and coaching terms and conditions, our Club Rules and policies/regulations and any other documents referred to in this policy explains how we will collect, process, use and protect any personal information which we collect from you or which you provide to us.

2. How we collect your information

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

- Directly from you, when you fill in an application for membership, when you make enquiries on our website, when you provide information via our Club management software or court booking system 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 or lessons, email us, complete a survey etc);
- From someone else who has applied for membership on your behalf (for example a family member or your tennis coach who has provided us with your contact details for that purpose);
- 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 the Club).

3. The types of information we collect

3.1 We may collect the following types of personal information about you:

- Contact and communication information, including your contact details (including email address(es), telephone numbers and postal address(es) and records of communications and interactions we have had with you);
- Financial information, including Direct Debit details;
- Certain other information which you volunteer when making use of your membership benefits (for example, when making court bookings or making use of other Club facilities).

3.2 We may also collect information about your health or medical conditions, where you have volunteered this, for example so that we can take this into account when you attend the Club to play or to have coaching.

4. Acceptance of Terms

4.1 By submitting information to us or using our Website or registering for services through the Website, you:

- Agree to accept the data protection practices outlined in this Privacy Policy; and
- Consent to our collecting and processing your personal information in accordance with this Privacy Policy.

5. Use of your information

5.1 Personal information 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.

5.2 More generally, we will use your personal information for the following purposes:

- Administration of your Club membership, including:
 - informing you about court/facilities opening hours;
 - taking payment of membership fees;
 - taking advice and action in relation to the collection of debts;
 - providing information of any services you have requested, including through the use of email and text message where appropriate;
 - to enforce our terms and conditions, policies, regulations and Club rules;
 - **storing** your details on the software platform we use for our online Club member management database/court booking system (where this is necessary for our legitimate interests). Please note that your own use of the software or system is subject to the Terms and Conditions and Privacy Policy published on that site;
 - fulfilment of orders for goods and services, including items purchased, court bookings;
 - administration of the Wimbledon ballot;
 - in any other way as described to you at the time of collection of your personal information.
- Research and statistical analysis about who is playing tennis in our Club.
- Communication about our Club activities that we think may be of interest to you.
- To notify you about our products, services, sponsors or special offers that may be of interest to you, notification of member services and profiling your membership preferences.

6. Disclosure of your information

6.1 We value your privacy and do not sell or your personal information to any third parties under any circumstances.

6.2 We may include announcements in some TWLTC communications, but we do not provide any of your personal information to third parties, except where required by law and except as set out below:

- To our agents, contractors and employees of TWLTC to administer your membership, your account and any products and services provided to you now or in the future.
- To any provider of membership management services;
- To mailing houses, sms/email systems provider and other distributors for the purpose of the distribution of other TWLTC information to you. Please note that use of the external distribution platform is subject to the Terms and Conditions and Privacy Policy published on that site.

- To anyone to whom we transfer or may transfer our rights and duties under our agreement with you.
- If we have a duty to do so or if the law allows us to do so. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.
- To third parties who will help process or administer TWLTC services or who will provide advice and take action in relation to the collection of debts.

7. Communicating with you

7.1 We will only send email or text messages to individuals who have requested that these mailings be sent to them, or as part of an ongoing relationship we have with an individual or business.

7.2 Your right to control what communications, if any, that you receive from TWLTC is important to us. The information below will assist you in understanding the different communication options you have and how you can notify us of changes in your preferences or to unsubscribe in general.

7.3 We provide notifications to members and those on our coaching programme including (without limitation) membership information, coaching changes or cancellations, membership and coaching terms and condition changes, invoices, direct debit information and sales statements. As these emails are a necessary part of how we run TWLTC, we need to be able to send them to you regardless of your marketing preferences.

7.4 We also maintain a list of individuals who have expressed an interest in receiving updates about Club issues, including our weekly newsletter. These communications may contain marketing material. You can subscribe to these updates at any time by following the instructions below.

7.5 You are in control of how we communicate with you. You can update your choices and/or your contact details by contacting us at:

Telephone: 01892 525625

Email: admin@twltc.co.uk

Post: TWLTC, Nevill Gate, Warwick Park, Tunbridge Wells, Kent TN2 5ES

7.6 You can also update your own preference settings if you:

7.6.1 Log on to the members' area of our website;

7.6.2 Click the "subscribe" tab

7.7 Should you wish to unsubscribe at any point:

7.7.1 Log on to the members' area of our website;

7.7.2 Click the "my details" tab;

7.7.3 Click the "emails" tab;

7.7.4 Adjust the "send documents by email" box at the top to suit your requirements.

7.7.5 Please do not tick or change any other boxes.

7.8 If you unsubscribe, you will still receive documents as set out in 7.3 above but we will be unable to send you any more general Club news and information. Email is our principal means of communicating with you so please help us to keep in touch by ensuring that the "send documents by email" box is ticked.

8. How long your information is kept

We keep your personal information only for as long as necessary for each purpose we use it. For most membership information, this means we retain it for so long as you have a valid Club membership and for a period of six years after your last interaction with us (for accounting, tax reporting and record-keeping purposes).

9. Access to Information

9.1 You have the right to make a written request for a copy of the personal information that we keep about you or to correct the details that we hold about you.

9.2 Under certain circumstances you have the right in writing to:

9.2.1 Request access to your personal information (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.

9.2.2 Request correction of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.

9.2.3 Request erasure of your personal information. This enables you to ask us to delete or remove personal information where there is no legitimate reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).

9.2.4 Object to processing of your personal information 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 information for direct marketing purposes.

9.2.5 Request the restriction of processing of your personal information. This enables you to ask us to suspend the processing of personal information 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 information.

9.2.6 Request the transfer of your personal information to another party.

Please note that the above rights are not absolute, and we may be entitled to refuse requests where exceptions apply.

10. Changes to this Privacy Policy

10.1 We reserve the right to update, modify and/or change this Privacy Policy at any time. Any such changes will be posted here. If you continue to use a TWLTC service after we have changed this Privacy Policy, you hereby consent to be bound by any such changes.

11. Security

- 11.1 In order to comply with our obligations under the General Data Protection Regulation, we will protect your personal data from unauthorised access, misuse, alteration or loss by using commercially reasonable security measures. Any payment transactions will be encrypted using SSL technology.
- 11.2 Nothing in this policy in any way excludes or limits our liability for negligence causing death or personal injury or for fraudulent misrepresentation.
- 11.3 The data that we collect from you will not be transferred to or stored at a destination outside the European Economic Area save for that relating to our use of the marketing platform of Mailchimp which we predominantly use for our newsletter. All such data is subject to their Privacy Policy.
- 11.4 Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of any data transmitted to our site; any transmission will be at your own risk.
- 11.5 We are not responsible or liable to you for any loss or damage you may suffer or incur in connection with your use of this site which is caused by an event beyond our control which includes the transmission of information by electronic means, material, content and data over the internet and the use of it by others.
- 11.6 When you become a member, you will be provided with a password which enables you to access certain parts of our site. You are responsible for keeping this password confidential. Please do not share your password with anyone.

12. Contact and complaints

If you have any queries about this privacy policy or how we process your personal information, or if you wish to exercise any of your legal rights or make a complaint, you may contact our Club Manager:

- by email: admin@twltc.co.uk;
- by telephone: 01892 525625;
- or by post: Nevill Gate, Warwick Park, Tunbridge Wells, Kent TN2 5ES.

If you are not satisfied with how we are processing your personal information or dealing with your complaint, 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.