

# Woodfield Grove Tennis Club



## Privacy Policy v5

Woodfield Grove Tennis Club takes your privacy seriously and we are committed to protecting your personal information.

This policy sets out how the Club uses the information that you provide us with in order to help further our provision of tennis, social and other facilities for its members.

### Privacy policy - your data

The Club was founded in 1924, is affiliated with the Lawn Tennis Association through the Tennis Surrey, and conforms to the rules of both these organisations.

We will not sell your data to any third parties, but we may sometimes share your information with the bodies to which we are affiliated.

We have appointed Barbara Wancke, Vice Chair of the Club and Webmaster, as our Data Protection Officer, who can be contacted by email to [webmaster@wgtc.co.uk](mailto:webmaster@wgtc.co.uk) or by phone 07974 186 098.

### Your Information – what we collect and how we use it

The Club collects information from members in a number of different ways.

For example, we ask for contact and other information when members join the Club or renew their subscriptions.

By becoming a member we only ask for information that enables us to administer your membership.

This may include your name, date of birth (if Under 18), contact information (including phone/mobile number and email address) and British Tennis Membership number if you have one.

We use this information to help us provide and improve our services as a Club and to communicate with you as a member.

We hold this information securely within our online bookkeeping server, Xero, and our online Point of Sale server, Vend, and it is synchronised between the two.

Xero runs daily online backups of the Club's bookkeeping data via multiple geographically separated data replicas and hosting environments, within which it is encrypted and stored in several locations online so that it is safe, secure and available when needed.

Vend hosts its infrastructure with Amazon Web Services, an ISO 27001 certified company with data centres secured with biometrics, 24-hour surveillance and 24x7 onsite staff providing additional protection against unauthorised entry.

Both therefore use encryption to hold your data secure and private.

From 1 May 2018, all membership information and renewals will be saved to ClubSpark, an online resource provided by the Lawn Tennis Association.

ClubSpark is controlled by Sportlabs Technology Ltd of The Courtyard, 7 Francis Grove, Wimbledon, London, United Kingdom, who take the privacy rights of all users of the website seriously and act always within the Data Protection Act 1998.

Information may be sent to your computer in the form of an Internet "cookie" to allow the Sportlabs Technology Ltd servers to monitor your requirements. The cookie is stored on your computer.

The Sportlabs Technology Ltd 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 the Sportlabs Technology Ltd to measure the usability of the systems, which will help in its continuing development to ensure that they understand the requirements of 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](http://www.allaboutcookies.org).

If you opt in to be included in the Members List on our secure member website so that other members may contact you, we will require your email address and mobile or phone number, and you will be asked to set your own password for access.

The website contains information and reports on all the Club activities and is accessed by secure login so, in addition to your email address for identification purposes, a unique username will be allocated to you in order to provide you with the means to log on.

Our online court booking service is provided by ClubSpark and access is therefore via your personal profile, for which you must be registered.

If you opt in to received our Member Alerts (newsletter), we will require your email address and will hold this private on a separate encrypted database held for us by Mad Mimi, our newsletter service provider, which is a GoDaddy® company.

Access to Mad Mimi's data is limited to a select number of senior personnel and utilises a hybrid of dedicated and cloud computing systems, all of which occupy SAS-70-Certified data-centres.

If you opt in to participate in our online tennis ladders, we will require your email and contact phone number to register you on [tennistrungs.com](http://tennistrungs.com), who will then ask you to set your own password.

TennisRungs.com uses software programs to monitor network traffic and will not obtain personally-identifying information about you when you visit the site, unless you choose to provide such information, nor will such information be sold or otherwise transferred to unaffiliated third parties without the approval of the user at the time of collection.

From time to time, members may set up group text messaging (such as via WhatsApp) to encourage participation in Club Sessions, which falls outside the scope of our Club Privacy Policy. If you do not wish to be included, you must delete yourself from such list(s).

## **What the Law says about protection of personal information**

The Law on Data Protection is derived from various pieces of legislation and can be found in a number of places.

These include the Data Protection Act and the General Data Protection Regulation (the 'GDPR'), enforceable from May 2018.

The GDPR states that personal data (information relating to a person that can be individually identified) can only be processed if there is a legal ground to do so.

Activities like collecting, storing and using personal information would fall into the GDPR's definition of processing.

The GDPR provides six legal grounds (reasons) under which personal information can be processed (used) in a way that is lawful.

For the processing to be permitted by law (lawful), at least one of the legal grounds must apply:

- Fairly and lawfully processed;
- Processed for limited purposes;
- Adequate, relevant and not excessive;
- Accurate;
- Not kept longer than necessary;
- Processed in accordance with your rights;
- Kept secure; and
- Not transferred abroad without adequate protection.

## **How the law applies to the Club's use of your personal information**

The Club will only process (use) your personal information if we have:

- asked you and have a record of your express and recent consent for us to do so;
- a 'Legitimate Interest' to do so in order to support our Club purposes;
- an application for membership form, or a renewal of membership from you, that we can only fulfil by using your personal information, e.g. to send you a renewal notice when your subscription falls due;
- a legal obligation to use or disclose information about you, e.g. if you have opted in for the Wimbledon ticket ballot and are successful.

In extreme situations, such as an accident or medical emergency, we may share your personal details with the emergency services if it is essential for the preservation of life (yours or that of another person) for us to do so.

This is the 'vital interest' ground for using your personal information. After the emergency, we will always try to inform you about how we had to use your information in that extreme situation.

We will not unduly prioritise our interests as a Club over your interests as an individual.

We will always balance our interests with your rights.

We will only use personal information in a way and for a purpose that you would reasonably expect in accordance with this Policy.

The Club will not rent, swap or sell your personal information to other organisations or third parties for them to use in their own marketing activities.

## **Consent**

The Club will always ask for your consent before we communicate with you for certain purposes.

For example, we will only email or phone you about our activities if we have an accurate record of your recent and freely given consent to do so. This will be requested when you register on ClubSpark.

You can withdraw your consent at any time by updating your personal profile on ClubSpark or by emailing [webmaster@wgtc.co.uk](mailto:webmaster@wgtc.co.uk) or phoning 07974 186 098.

There are times when it is not practical to obtain and record consent, such as during the use of CCTV surveillance cameras outdoors at the Club.

At those times, we will only process personal information if that processing would meet another legal ground e.g. Legitimate Interests, in which case we would only process in accordance with the law's strict rules on legitimate interest processing.

You will be asked to confirm your understanding of such use when you register on ClubSpark.

## **CCTV**

Closed circuit television is used at the club for maintaining the security of the property and premises and for preventing and investigating crime. It may also be used to monitor individuals for safeguarding purposes.

CCTV monitors record individuals entering and leaving the Club premises, which include but are not limited to members, coaches, coaching clients, accompanying people, visitors and others authorised to enter the Club.

There are two cameras recording activity in the alleyway from the front gate of the property to the Clubhouse, and the area behind the Clubhouse in which there is a storage shed for bar stock.

Live footage is recorded on a 24-hour basis, encrypted onto a hard drive, and held for 7 days on a continuous loop, after which time it is recorded over.

This surveillance system is registered with the ICO (Information Commissioner's Office) and used in compliance with the DPA Code of Practice, with appropriate signage indicating the presence of a CCTV system clearly displayed throughout the premises.

The system is under the control of the Data Protection Officer, the Chairman and the Management Committee of the Club.

Any personal information recorded on the surveillance system, such as images, will be held confidential and only accessed in the event of an incident warranting the re-playing of footage over the time period in question.

Disclosure to third parties, such as the emergency services, will only occur in the event of an incident warranting the same.

Except for law enforcement bodies, images will not be provided to third parties.

Viewing of live images on monitors is restricted to the Chairman and the Data Protection Officer where it is necessary for them to see it, e.g. to monitor congestion for health and safety purposes.

## **Club Entry System**

As a Club Member, you will receive a swipe card to enable you to access the Club at any time.

Swipe cards, which are numbered and activated by way of a control panel located in the bar, do not carry any personal data, although your number is logged with your record on our online bookkeeping server, Xero, and our online POS server, Vend, and is synchronised between the two.

In addition the Club has an audio visual Entry System at the locked gate that is controlled from an iPad in the clubhouse to prevent unauthorised access to the premises.

When the pushbutton signal at the gate is activated, the person is viewed via the live camera on the gate for identification purposes only, but no recording is made.

Use of swipe cards do not activate the audio visual Entry System.

## What is Legitimate Interest

'Legitimate Interest' is the legal ground for processing, which means that organisations can process your personal information if they:

- 1) Have a genuine and legitimate reason for doing so; and
- 2) That use does not harm any of your rights and interests as an individual.

## The Club's Legitimate Interest

We do not unduly prioritise our legitimate administrative interests as a Club over your interests as an individual.

We always respect your rights, which is why we carry out a balancing exercise of the rights of the Club with the rights of our members.

We have established the following four groups for Club member data protection to provide us with the means to use your personal information in a way that matches your relationship with us; namely that members have:

- pledged their interest in being a member
- signalled their interest in participating on our secure website
- opted in for online court bookings and/or online tennis ladders
- opted in to receive Club communications

Unless you tell us not to, we think you are content for us to process (keep and use) your personal information for the following lengths of time.

As of May 2018, we promise not to keep your personal information for longer than we specify below.

- Membership dues: Two years after your membership has lapsed unless you request otherwise
- Website access: This will be removed immediately it is clear to us that your membership has lapsed
- Online Booking and/or Tennis Ladders: This will be removed immediately it is clear to us that your membership has lapsed
- Club Communications: This will be removed immediately it is clear to us that your membership has lapsed

## Legitimate Interest to process your information

We aim to be clear about what information we collect, to enable you to make meaningful choices about how it is used.

When it is necessary we will contact you for administrative purposes, e.g. to contact you regarding a payment.

We will only hold the minimum personal information required to support our ability to respect your preferences for communication with us.

To help you to understand when and why the Club would use Legitimate Interest to process your personal information we provide the following examples:

- To send communications (as explained above)
- To enhance, modify, personalise and improve our services and communications for the benefit of our members.
- To improve security of our websites and systems.

- To prevent fraud when transacting on our website.
- To process your membership dues.
- To analyse your personal information to ensure that our communications are relevant to you.

The above list of examples are on the basis that the processing will not be done if it harms your rights and interests as an individual, or if you tell us that you would like us to stop.

You can do this at any time by email to [webmaster@wgtc.co.uk](mailto:webmaster@wgtc.co.uk) or by phone 07974 186 098.

## Data Analysis

In order to communicate with you more effectively, better understand your preferences and ability to support our mission, we may analyse your data.

We like to find out about your personal motivation for supporting the Club and your experiences as a member.

This helps us to give you the information about activities and services most relevant to you.

## Data Sharing

To help us communicate the activities we are arranging and to enable us to provide these, we use trusted service providers.

These include but are not limited to our online court booking service, ClubSpark; our online ladders, [tennisrungs.com](http://tennisrungs.com); and Mad Mimi, our newsletter service; while our internet provider for our websites is TAB Services.

We have exercised due diligence when selecting our service providers and are confident that they fulfil the conditions of GDPR and privacy in taking care of the information that they store on our behalf.

We only share data for our affiliations. We never sell data.

## Changes to your data

Should you wish to change your preferences you can do this by visiting your personal profile on ClubSpark or by writing to us at Woodfield Grove Tennis Club, 9 Woodfield Grove, Streatham, London SW16 1LR or by email to [webmaster@wgtc.co.uk](mailto:webmaster@wgtc.co.uk) or by phone 07974 186 098.

Like all organisations, we comply with requests for the disclosure of personal information where this is required or permitted by law.

If you believe your privacy rights have been violated, you may file a complaint with us or with the Information Commissioners office at <https://ico.org.uk/>.

## Cookies and Web Privacy

We at the Club guarantee our commitment to respecting and protecting your online privacy, including your need and your right to know what we do with the personal information you share with us.

It also guides our Club policies regarding the management of this data, including how the information is collected, processed, and for what purposes.

“Club Website” or “website”: refers to our web pages.

By accessing our Club Website you are consenting to the way information is collected and used, as described within this Privacy Policy.

In return, the Club gives the commitment that we will use the personal data you provide only in ways that are compatible with the following Privacy Policy.

### **The collection of information**

Every time you log on to our website your IP (Internet Protocol) address registers on our servers.

Your IP address reveals no information other than the number assigned to you.

We do not use this technology to get any personal data against your knowledge or free will (i.e., automatically recording e-mail addresses of visitors).

Nor do we use it for any purpose other than to help us monitor traffic on our website, or (in case of criminal activity or misuse of our information) to cooperate with law enforcement.

### **Cookies**

We use a number of different cookies on our site, which is powered by WordPress and uses cookies for two purposes:

1. Registered members need a cookie to be able to log in. This is strictly necessary as WordPress will not work without it.
2. Visitors who leave a comment on a blog post will also have a cookie set on their computer. This is not strictly necessary as it is a user preference.

We also use Google Analytics and/or JetPack to track how our website is used, while certain plugins may also use cookies, such for preventing spam.

Analytics collect information about visitor behaviour on our website, storing this information about what pages you visit, how long you are on the site, how you got here and what you click on.

This analytics data is collected via a JavaScript tag in the pages of our site and is not tied to personally identifiable information.

We therefore do not collect or store your personal information (e.g. your name or address) so this information cannot be used to identify who you are.

If you do not know what cookies are, or how to control or delete them on your computer, then we recommend you visit <http://www.aboutcookies.org> for detailed guidance.

Currently we operate an 'implied consent' policy which means that we assume you are happy with this usage.

If you are not happy, then you should either not use our Club website, or you should delete the cookies having visited the site, or you should browse the site using your browser's anonymous usage setting (called "Incognito" in Chrome, "InPrivate" for Internet Explorer, "Private Browsing" in Firefox and Safari etc.).

### **Third Party Cookies**

These are cookies set on your machine by external websites whose services may be used on this site.

Cookies of this type are the sharing buttons allowing visitors to share content onto social networks, such as Twitter and Facebook.

In order to implement these buttons, and connect them to the relevant social networks and external sites, there are scripts from domains outside of our website.

You should be aware that these sites are likely to be collecting information about what you are doing all around the internet, and should therefore check the respective policies of each of these sites to see how exactly they use your information to find out how to opt out, or delete, such information.

## **Emails**

Some emails that we send you have no tracking in them at all, e.g. service emails with notices attached.

Other emails we send, such as our newsletters, we can track, at an individual level, whether the user has received, opened and clicked on the email.

We use this information to understand open and click rates on our emails to try and improve them.

If you want to be sure that none of your email activity is tracked then you should opt out of our emails, which you can do via the unsubscribe link at the bottom of every Member Alert newsletter email we send.

## **Web Security**

Financial transactions may be made from time to time online to the Club using PayPal via our website and are secure, e.g. for tournament entry fees.

No one can access your credit card details via the internet when using PayPal.

## **How our website works**

When you have completed your payment, your web browser will be connected directly to PayPal.

You can see that the connection is secure by looking at the padlock or key icon in the bottom left hand corner of your browser.

Your browser may alert you to the fact that you are connecting to a secure server and, if so, it will also tell you when you are closing the secure connection once you have paid. This is for your information only.

PayPal communicates with your browser using SSL (Secure Sockets Layer) protocols, so that all your personal information, including credit card number and your name and address, is encrypted and held secure by them.

This process takes the words and figures you enter, and converts them into bits of code that are then securely transmitted over the internet.

## **Information**

All information given on our web site is to the best of our ability.

Whilst the Club is happy to provide advice, assistance and guidance relating to the playing the sport of tennis, such guidance is based only on information supplied to the Club, which will NOT be liable for injury, loss or damage arising from such guidance.

You may print any pages on our websites for your own information and your personal use but you may NOT sell it, reproduce it on the Internet, distribute it, alter it, or reprint it in any publication without permission from the Club.

Please note that all material on our websites is the copyright of the Club or third parties.

The name and logo of the Club are the Club's property, and any use of these must be made with the prior express permission of Club Management Committee.

If you are unsure what material you can or cannot use please contact Barbara Wancke, our Data Protection Officer, by email to [webmaster@wgtc.co.uk](mailto:webmaster@wgtc.co.uk) or by phone 07974 186 098.

## **Photography**

All photography on our website is reproduced with kind permission of the photographers concerned.

From time to time photographs are taken around the Club for the purposes of promoting the Club's activities on the website and/or in newsletters.

At such times consent by you is implied as it is not practical to obtain and record consent from each individual included but you may withhold your express consent by advising Barbara Wancke, our Data Protection Officer, by email to [webmaster@wgtc.co.uk](mailto:webmaster@wgtc.co.uk) or by phone 07974 186 098.

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This Privacy Policy information was last updated in April 2018 and, from time to time, we may make changes to the information on these pages.

The amended information will apply from the date it is posted on our website site and will govern the way in which we collect and use personal information from then on.

Management Committee  
Woodfield Grove Tennis Club  
20 April 2018

## Our Promises to you...

Your support is vital for the club. It helps us continue to provide tennis facilities for the local community in a safe and friendly environment.

Because your support is so important to us, we want you to know how carefully we look after your personal details.

If you are unhappy with how we do this, or have any queries, just let us know.

### We promise to:

- Always hold your details securely.
- Only ever share your information with Tennis Surrey as may be required for the purposes of competitions and the Lawn Tennis Association in connection with the Wimbledon ticket ballot.
- Only ever get in touch with you in the ways that you wish, and we will make sure that everything we send to you is relevant to our activities and your membership of the club, such as subscription renewals.
- Only analyse your data in order to communicate with you more effectively, better understand your preferences and ability to support our activities. To read our full privacy policy please visit the club members website.
- Make sure you are in control of your information, and that you can ask us to stop using it whenever you like. If you have any questions, would like to change your preferences, or opt out of communications, just advise us by emailing [webmaster@wgtc.co.uk](mailto:webmaster@wgtc.co.uk) .

We promise to make every possible effort not to let you down.

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Management Committee  
Woodfield Grove Tennis Club  
26 March 2018