



# POLICY

## PRIVACY POLICY

### REVIEW AND APPROVAL:

<b>EFFECTIVE DATE</b>	22/05/2018	<b>AUTHOR</b>	Deborah Slater / Dee Desforges-Houle (Consultant)
<b>LAST REVISION DATE</b>	26/02/2024	<b>APPROVER</b>	Peter Bradshaw
<b>DOCUMENT NUMBER</b>	POL-008		

### APPLIES TO:

Players, coaches, clubs, and other stakeholders interacting with Surrey Tennis

### VERSION HISTORY:

VERSION	APPROVED BY	REVISION DATE	DESCRIPTION OF CHANGE
V1	Deborah Slater	22/05/2018	Document creation
V2	Peter Bradshaw	26/02/2024	Address change, content review & adjustments re data collection purposes.

# 1. Introduction

Surrey Tennis pays the utmost attention to the protection of your personal data. This Privacy Policy explains how we collect, use, protect, and disclose personal data that we gather from players, coaches, Clubs, web users and other stakeholders at all times. This is accomplished by implementing procedures that comply the General Data Protection Regulation ("GDPR") and UK data protection laws.

"Personal data" is any information that relates to a natural person and allows, directly or indirectly, to identify that individual. This definition applies to data collected and maintained by Surrey Tennis (also referred to as "the Association") or by a third-party partner, regardless of the nature of its medium and the form in which it is accessible.

When we refer to "we", "us" or "our" in this Privacy Policy, we are referring to the relevant Surrey Tennis stakeholders responsible for processing personal data.

## 2. How we collect personal data

We may collect your personal data in a few limited ways, including:

- Directly from you when you provide information via the Association's management software or contact us by email, phone or otherwise for any reason, including:
  - when you enter a competition, tournament or league run by us (for example Surrey Leagues, County Championships, Junior Trophy, etc.);
  - sign up for a course or workshop run by us;
  - reply to an invitation to attend a Surrey Tennis event (for example County training, Awards Ceremony, etc.);
  - when you fill in an application for membership, i.e. Lawn Tennis Association (LTA) Venue Registration;
  - reply to an invitation to purchase Wimbledon tickets or other similar tickets;
  - provide support, financial or otherwise, to us or request such support from us, (for example Great British Tennis Weekend Offer, Tournament Subsidy, Venue grant or loan, Coaches Bursary);
  - when you make enquiries on our website;
  - when you interact with us as a user of any other Surrey Tennis Service.

- From someone else who has applied for services on your behalf (for example a family member or your tennis coach who has provided us with your contact details for that purpose).
- From your British Tennis Membership record, as made available to Surrey Tennis by the LTA.
- From the LTA (for example, when the LTA passes on your details to us in connection with a complaint or query you have raised about a Surrey Tennis service/event).

### 3. Personal data we collect

We may collect the following types of personal data about you:

- Contact and communications information, such as email address(es), telephone numbers, postal address(es) and records of communications and interactions we have had with you.
- Financial data, including Direct Debit details.
- Certain other information required when making use of our services (for example, British Tennis Membership number, Tennis Role, age/date of birth, Club memberships, coach accreditation status).
- We may also collect data about your health or medical conditions, for example so that we can cater for you when you attend a Surrey Tennis social event or competition/camp.
- Tracking & Cookies Data: cookies are small files that can be downloaded to the visitor's device when visiting and using Surrey Tennis's Websites. They make it possible to recognise devices and store information about users' previous preferences or actions.

### 4. How we use personal data

Personal data 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.

We collect and process personal data, provided with consent, for the following purposes:

- Promoting and administering Surrey Tennis services you may be interested in, for example:

- county training, county and LTA run competitions and Awards ceremony;
- membership of groups, such as Surrey Coaches Group, Surrey Disability Forum;
- distribution of the Surrey Tennis Quarterly (STQ);
- subsidies, grants and loans;
- equipment purchase / loan schemes;
- publishing results and photos of events and competitions on our website, Facebook page, Twitter account, LinkedIn account, and/or Instagram account;
- where this is necessary for our legitimate interests and/or where we have your consent, as applicable.
- Promoting goods and services of third parties, such as:
  - LTA initiatives;
  - equipment suppliers, operators of coaching courses, and organisers of tennis events where we think this will be of interest to you;
  - where this is necessary for the legitimate interests of a third party, and/or where we have your consent, as applicable.
- Administration of your Surrey Tennis service, including:
  - confirming dates, times, venues and your attendance at events and/or competitions you have entered;
  - ensuring the provision of suitable facilities (food, accommodation, etc) when attending a Surrey Tennis event;
  - administering the allocation of Wimbledon tickets;
  - to pay approved expenses incurred at a Surrey Tennis event;
  - administering applications from you for financial support from Surrey Tennis;
  - when you are engaged as a coach for any of the teams representing the Association, for the purpose of that activity;
  - arranging events at your venue, such as booking courts for county training, county championships, rooms for forums/courses;
  - facilitating communication between you and employees, volunteers or officers of the Association and/ or others engaged with the Association pursuant to its activities.

## 5. How we store and retain your personal data

Your details will be stored securely in order to comply with General Data Protection Regulation ("GDPR") and UK data protection laws. Please note that your own use of the software or system is subject to the Terms and Conditions and Privacy Notice published on those sites.

We retain personal data for as long as is strictly necessary for the purposes for which it was collected or if necessary to comply with our legal and contractual obligations. Retention periods will be determined considering the type of data that is collected and the purpose for which it is collected, bearing in mind the requirements applicable to the situation and the need to destroy outdated, unused data at the earliest reasonable time. For most membership data, this means we retain it for so long as your venue has a valid registration and for a period of six years after your last interaction with us (for accounting, tax reporting and record-keeping purposes).

## 6. Your marketing preferences

We will always respect your wishes in respect of what type of communications you want to receive from us and how you want to receive them. There are some communications, however, that we need to send you regardless of your marketing preferences in order for us to fulfil our contractual obligations to you as a member of our Association. Examples of these essential service communications are:

- Records of transactions, such as payment receipts or Direct Debit confirmations (as applicable).
- Surrey Tennis Membership related mailings.
- Information from the LTA concerning your venue's registration with them or concerning the administration of your venue.
- Communication about any competition or tournament or league which you or your venue have entered or wish to enter.

## 7. Sharing your data with others

We do not sell or share your personal data for other organisations to use other than as set out below.

Personal data collected and processed by us may be shared with the following third parties, where necessary:

- Surrey Tennis employees and volunteers, for the purposes of administering your service and giving you access to the Association benefits to which you are entitled.
- Contractors and suppliers, including coaches, and third parties as necessary, i.e. All England Lawn Tennis Club, van hire companies, hotels, sport equipment suppliers, cloud based IT Service providers, such as Microsoft.
- The LTA.
- Other County Tennis Associations.

## 8. Your rights

As permitted under applicable laws, you may exercise the following rights with regards to the personal data we hold about you:

- Request access to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you.
- Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have exercised your right to object to processing (see below).
- Object to processing of your personal data 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 data for direct marketing purposes.
- Request the restriction of processing of your personal data. This enables you to ask us to suspend the processing of personal data 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 data (without affecting the lawfulness of our previous processing based on consent).

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

The transmission of any personal data is subject to the verification of the identity of the applicant according to the procedure in place within Surrey Tennis.

## 9. Contact and complaints

If you wish to have access to your personal data, wish to modify it or if you are not satisfied with the processing of your personal data, please contact the Surrey Tennis Data Protection Officer:

Deborah Slater, Office Manager

Email: [admin@surrey.tennis](mailto:admin@surrey.tennis)

Postal address: Suite 4 Ground Floor, 79a Grapes House, Esher, Surrey, KT10 9QA

Phone: 02045680780

If you are not satisfied with how we are processing your personal data, you can make a complaint to the Information Commissioner. You can find out more about your rights under applicable data protection legislation from the Information Commissioner's Office website available at [www.ico.org.uk](http://www.ico.org.uk).