# OAKLEIGH PARK LAWN TENNIS AND SQUASH CLUB (OPLTSC) DATA PRIVACY POLICY

# 1. Introduction

- 1.1 Oakleigh Park Lawn Tennis and Squash Club (hereinafter referred to as "OPLTSC" or "we" or "us") is a private members club "...run by members for the benefit of members..." and is managed by a main committee made up of volunteers (who are themselves members).
- 1.2 The main committee co-ordinates with sports section sub-committees to assist them in running OPLTSC and engage paid staff who work on a day-to-day basis to operate and oversee the administration of OPLTSC.

## 2. About this Policy

- 2.1 This Data Privacy Policy explains what personal information is collected by OPLTSC and for what purpose, how we use this information, why we need it, where it is kept and your rights.
- 2.2 We reserve the right to amend this Data Privacy Policy from time to time and we will notify you via notices displayed in the OPLTSC Club House and / or via email.
- 2.3 We will always aim to comply with current Data Protection Laws when dealing with personal data. Further information on Data Protection Laws can be found on the website of the Information Commissioner (<u>www.ico.gov.uk</u>).
- 2.4 For the purposes of Data Protection Laws :-
  - 2.4.1 OPLTSC Committee will act as Data Controller; and
  - 2.4.2 You (i.e. members/non-members who attend courses/staff/coaches or anyone else whose personal information we collect) are 'Data Subjects'.

Type of Information	Purpose	Legal basis of processing
Full name Address Telephone number/s	To administer and manage membership and courses.	Legitimate interests (in operating OPLTSC and running courses).
Email address	To send invoices and notifications regarding membership renewals, subscription charges, court / floodlight fees and coaching fees.	Contract (for processing and storing of your membership agreement).
	To keep members informed of club events and forthcoming meetings (if they consent) by email newsletter.	Consent (for communicating with you about events via email newsletter)
	To verify members identity. To enable OPLTSC to contact members if there are any changes to bookings and / or courses, etc.	
	To register non-members onto courses run by OPLTSC.	

## 3. What personal information will be collected and why?

Profession	This information is voluntary and solely used so members' skills can be used to help run OPLTSC or quote for work to be undertaken	Consent.
Date of birth	<ul> <li>To determine which category of membership members are eligible to join to ensure correct membership fees are charged.</li> <li>To calculate staff ratios for safeguarding purposes and to ensure safeguarding regulations are adhered to</li> <li>To register non-members onto courses run by OPLTSC. Age is required for junior courses to determine staff ratios for safeguarding purposes.</li> </ul>	Legitimate interests (in operating OPLTSC). Legal obligation (to comply with safeguarding regulations).
Bank Details	For processing of payments	Contract.
Gender	For the provision of adequate gender specific facilities for members. To determine staff ratios and for safeguarding purposes.	Legitimate interest (in providing adequate facilities and for safeguarding purposes). Legal obligation (to comply with safeguarding regulations).
Emergency Contact Details	To contact next of kin in case of emergency.	Vital Interests (in case of emergency)
Medical Information including allergies	<ul> <li>To ensure OPLTSC staff are aware of any medical conditions that may affect a member's or non-members participation.</li> <li>To provide relevant information to specialist responders during an emergency.</li> <li>To minimise exposure where data subjects have allergies or intolerance to certain foods or substances.</li> </ul>	Legitimate interest (in providing adequate facilities and for safeguarding purposes). Vital Interests (in case of emergency)
Photography/ Video Consent	Photographic images may be used on OPLTSC marketing material and feature on the website/social media.	Consent.

# **EMPLOYEES / FREELANCERS**

Type of Information	Purpose	Legal basis of processing
Full name Address Telephone number/s Email address Date of birth	For the purpose of employment at OPLTSC and the formation of employment contracts. To ensure that staff receive the correct	Legal obligation (to comply with employment law and the right to work in the UK).
National Insurance Number	payment band according to their age.	
Copy of Passport and/or Birth	DBS Checking criteria if required.	
Certificate Qualifications and References For the purpose of suitability for employment at OPLTSC and the formation of employment contracts	For the appropriate payment of taxes including national insurance. Contributions and pensions via HMRC	
Bank Details	To pay staff	Contract (in accordance with employment contracts)
Gender	For the provision of adequate gender specific facilities for staff. To determine staff ratios and for safeguarding purposes.	Legitimate interest (in providing adequate facilities for all staff and for safeguarding purposes). Legal obligation (to comply with safeguarding regulations).
Emergency Contact Details	To contact next of kin in case of emergency.	Vital Interests (in case of emergency)
Medical Information including allergies	To ensure OPLTSC staff are aware of any medical conditions that may affect employees/freelancers when at work.	Legitimate interest (in providing adequate facilities and for safeguarding purposes).
	To provide relevant information to specialist responders during an emergency. To minimise exposure where data subjects have allergies or intolerance to certain foods or substances.	Vital Interests (in case of emergency)

Photography/ Video	Photographic images may be used on	Consent will be obtained
Consent	OPLTSC marketing material and feature on	
	the website and / or social media.	

#### 4. OPLTSC Members Directory via ClubSolution and ClubSpark and on noticeboards

- 4.1 If you are an existing members (as of April 2021) you are responsible for setting your own preferences within the online court booking systems ClubSolution and ClubSpark to make visible only the information you wish to allow other members to see for the purpose of arranging matches / games.
- 4.2 If you are a new member, we will obtain your consent for any personal information to appear on noticeboards throughout the OPLTSC club house.
- 4.3 Members' information will only be available in this way for the purpose of contacting other members to arrange matches/games and you must not use the information for any other purpose.
- 4.4 Section heads and captains will require your consent to be able to forward your information to any other members.
- 4.5 Any 'mass' correspondence to be made to the membership base will be made via the OPLTSC Office and the Club Management only as the 'Controller' under Data Protection Laws and members must not contact the membership base for any purpose.

#### 5. Special Categories of Personal Data

- 5.1 We may process information about your health or your child's health, for example to ensure the safety of your child or to comply with our obligations under health and safety law.
- 5.2 Where the processing is to provide a service to you, we will always ask for your agreement if you are not happy for us to have this information you do not have to agree, and you can change your mind and withdraw your consent at any time, but this may mean that your child is unable to take part in an event or course.

## 6. Track and Trace

6.1 If it becomes necessary to prevent the spread of infection around the UK we will support the NHS Track and Trace system. There will be a QR code to register your arrival at OPLTSC and if requested by the NHS to provide visitor information, due to an outbreak in the vicinity of OPLTSC, and you have recently visited OPLTSC, we will supply them with your name, contact number and date of visit. If you do not wish us to do this, please notify us at the time of your visit or by email to the email address set out in section 11.3.

## 7. Marketing

- 7.1 We may use your personal information to provide you with marketing information about OPLTSC such as newsletters, surveys, announcements and invites to courses or events that will be of interest to you.
- 7.2 You can opt out of receiving marketing messages at any time by following the unsubscribe links located within any electronic communication from us.
- 7.3 You can also contact us by phone or email using the contact details set out in section 11.3 below.
- 7.4 Please note that, even if you opt out of receiving marketing messages, we may still send you membership related communications where necessary.

#### 8. CCTV

- 8.1 OPLTSC has CCTV covering areas within the club and the grounds images are only reviewed in the interest of safety and security of members and staff.
- 8.2 CCTV recordings are stored on a hard drive in the OPLTSC clubhouse which is kept locked when not in use. Such recordings are also accessible via the Cloud by authorised OPLTSC committee members only.
- 8.3 Images are recorded on a continuous loop and are not retained unless it is necessary for the purposes of investigating an incident at OPLTSC.

#### 9. How We Protect your Data

- 9.1 OPLTSC will keep your data secure and only use it for the purposes set out in this Data Privacy Policy.
- 9.2 Access to members data in ClubSolution and ClubSpark and employment / freelance personnel files is restricted to those individuals who administer and manage the memberships only. The OPLTSC Committee will determine the appropriate access level.
- 9.3 Except as provided in section 9.4, no information will be transferred outside of OPLTSC to any third parties.
- 9.4 OPLTSC may share your personal information with its appointed accountants for the purpose of payroll services and ensure its accountants keep such information secure.
- 9.5 No personal data will be transferred outside of the UK.
- 9.6 Where information and data is sent to OPLTSC via the internet this cannot be guaranteed to be 100% secure.
- 9.7 OPLTSC will use reasonable endeavours to notify you promptly in the event of any breach involving your data.
- 9.8 Paper copies of signed membership agreements are stored in a locked office on OPLTSC premises and will be destroyed by shredding in accordance with the OPLTSC data retention and destruction policy outlined in section 10.
- 9.9 Personnel files are kept in a locked filing cabinet on OPLTSC premises.
- 9.10 All communications from OPLTSC to you will be sent via the OPLTSC email address and not from individual members.

#### 10. How long do we keep your information?

- 10.1 Members we will hold your personal data in electronic form or hard paper copy for as long as you hold a valid membership (this will include personal data of all dependents related to any one membership) and are paying the appropriate subscription fees.
- 10.2 At the end of your membership, except as provided for in section 10.4, all data (electronic and hard paper copies) will be deleted / destroyed after 12 months.
- 10.3 Non-members where you are not a member but attend one of our courses or events we will hold your personal data in electronic form or hard paper copy for as long as you are enrolled on any courses or until after the date of any event.
- 10.4 Subject to obtaining your written consent, OPLTSC will retain some personal data, such as: name, address, contact phone number and email address in order to periodically communicate with you, primarily by email, to keep you updated on OPLTSC developments and / or membership promotions. This will be reviewed annually. If permission is not granted – all information will be deleted/destroyed after 12 months.
- 10.5 All financial information relating to you will be securely destroyed once the information has been used and is no longer required.
- 10.6 With respect to any personal information we hold about you for the purposes of employment (including pension related information), we will retain copies of all records for a minimum of 6

years after the end of your employment with us. If you are a foreign national , we will retain identity information for a minimum of 2 years after the end of your employment with us.

## 11. Your Rights

- 11.1 Under Data Protection Laws you have the following rights :-
  - 11.1.1 To request access to the personal information held about you by OPLTSC;
  - 11.1.2 To be provided with information on how your personal data is processed;
  - 11.1.3 To have your information updated / amended if the personal information OPLTSC holds is inaccurate or incorrect;
  - 11.1.4 To have your personal data removed / deleted in certain circumstances;
  - 11.1.5 To object to or restrict how your personal data is used and processed in certain circumstances;
  - 11.1.6 To receive the information in a portable electronic form; and
  - 11.1.7 To have the right not to be subject to any decision based on automatic processing of your personal data
- 11.2 To exercise your rights, contact us using the details set out in section 11.3.You will have to give us enough information so we can identify you and the relevant personal information that your request relates to.
- 11.3 If you have any queries or would like to discuss anything in this privacy notice please contact:
   100 Oakleigh Road North, London, N20 9EZ.
   Email: <u>office@oakleighparkclub.co.uk</u>
   Tol: 02084457221

Tel: 02084457221

11.4 You have the right to complain about how OPLTSC uses and processes your personal data to the Information Commissioner :

Website : https://ico.org.uk/concerns/

Telephone : 030 123 1113

Postal Address : Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF.