

DATA PROTECTION – PRIVACY POLICY

About this document

This privacy notice will inform you as to how Dean Lawn Tennis & Squash Club looks after and deals with your personal data and will tell you about your privacy rights and how the law protects you.

It aims to give you information on how we collect and process your personal data, including any data you may provide through this website when you complete the Contact Us form or you sign up to our Mailing List. It is important that you read this privacy notice so that you are fully aware of how and why we are using your data.

Dean Lawn Tennis & Squash Club (referred to as “Dean” hereafter) will be a “controller” of the personal information that you provide to us using this website, email or as part of your membership application and/or ongoing membership of Dean, unless otherwise stated.

Contact

If you wish to contact us, our full details are:

Full name of legal entity: Dean Lawn Tennis & Squash Club

Name of Data Privacy Committee Member (Volunteer): Catherine Baker

Email address: see contacts page on the Club’s website

Postal address: 24 Lennox St, Edinburgh EH4 1QA

The data we collect about you

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

When you register as a member of Dean or renew your membership (including if you are registering or renewing on behalf of a child under the age of 18), we will ask you for the following personal information (and some of the information below you may provide to us through our website):-

- **Identity Data** includes name, title and date of birth;
- **Contact Data** includes address, email address and telephone numbers;
- **Financial Data** we do not as a matter of course ingather any personal financial data from you but our payment provider “MemberMojo” may do so and this may include payment card details (details of the MemberMojo privacy policy are: <https://membermojo.co.uk/mm/help/privacy>);
- **Transaction Data** includes details about payments from you in relation to your membership;
- **Technical Data** includes internet protocol (IP) address, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website.
- **Usage Data** includes information about how you use our website and services (including in relation to booking the facilities).
- **Communications Data** includes your preferences in receiving newsletter and member information from us (usually by email) and your other communication preferences.

We do not collect any **Special Categories of Personal Data** about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

How we collect your personal data

We use different methods to collect data from and about you including through:

Direct interactions. You may give us your Identity, Contact, Financial, Transaction and Communications Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:

- visit Dean;
- become a member;
- interact with our website or services provided by 3rd party contractors such as MemberMojo in connection with payment for membership;
- send an email to our enquiries address;
- enter a competition;
- enter a tennis or squash team or league; or
- give us some feedback.

Third parties. We may receive personal data about you from various third parties as follows:

- Contact, Financial and Transaction Data from providers of technical, payment and delivery services.
- Identity and Contact through a partnership with our coaches for tennis and squash where you have taken coaching as a non-member and/or asked for further information in connection with membership from the respective coach.

Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with membership). In this case, we may have to cancel memberships you have with us but we will notify you if this is the case at the time.

How we use your personal data

We have set out below, a description of all the ways we plan to use your personal data, and which the lawful basis on which we rely on to do so. We may process your personal data on more than one lawful basis depending on the specific purpose for which we are using your data.

Purpose / Activity	Type of Data	Lawful Basis for Processing
To provide a service to you or process and deliver your membership (including to register you as a member at our premises in accordance with our member access policies and manage payments, fees and charges, manage booking of facilities etc)	Identity, Contact, Financial, Transaction and Communications	<ul style="list-style-type: none"> • Performance of a contract with you • Necessary for our legitimate interests (to ensure your health and safety whilst on our premises and for our membership interests, provide for insurance) • We are under a legal obligation to process certain personal information relating to our members for the purposes of complying with our obligations under the Protection of Vulnerable Groups (Scotland) Act 2007 to check that our coaches and volunteers are able to undertake regulated work with children and vulnerable adults.
To keep our premises secure and to prevent crime (including through the use of a door logging mechanism that tell us if you have used your “key fob” to enter the clubhouse building and/or CCTV if deemed necessary for security)	Identity and Contact data	<ul style="list-style-type: none"> • Necessary to comply with a legal obligation • Necessary for our legitimate interests
To manage our relationship with you (including notifying you about changes to our terms or privacy policy and asking	Identity, Contact and Communications	<ul style="list-style-type: none"> • Performance of a contract with you • Necessary to comply with a legal obligation

<p>you to leave feedback or a review or take a survey)</p> <ul style="list-style-type: none"> • Promote and encourage participation in the sport of tennis and squash by sending members' communications and booking information for upcoming competitions/ events. Our competitions/ events may be filmed or photographed and your personal information may also be used in images captured from our competitions/ events, which we use for promotional, education and development purposes; • Provide club competitions by accepting and managing entries for our competitions and checking your personal information to ensure you are entered into the correct category; • Respond to and communicate with members regarding your questions, comments, support needs or complaints, concerns or allegations in relation to Dean. We will use your personal information to investigate your complaint, suspend membership and take disciplinary action where appropriate. 		<ul style="list-style-type: none"> • Necessary for our legitimate interests
<p>To enable you to partake in a competition, sport specific leagues and cups (including administration thereof, team competition or prize draw (including the "Wimbledon" ballot)</p>	<p>Identity, Contact, Financial, Transaction and Communications</p>	<ul style="list-style-type: none"> • Performance of a contract with you and to provide you with details of your entry in any league or competition • Necessary for our legitimate interests
<p>To study how our members use our club, to develop facilities and grow our membership</p>	<p>Identity, Contact</p>	<ul style="list-style-type: none"> • Necessary for our legitimate interests

The Dean website may include links to third party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites, plug-ins and applications and we are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

If you do not provide us with all of the personal information that we need to collect then this may affect our ability to offer the above membership services and benefits.

Where we process your personal information in pursuit of our legitimate interests, you have the right to object to us using your personal information for the above purposes. If you wish to object

to any of the above processing, please contact the Club's Data Privacy Committee member. If we agree and comply with your objection, this may affect our ability to undertake the tasks above for the benefit of you as a member.

Change of Purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us. If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Data sharing

We may have to share your personal data with the parties set out below.

- Professional advisers including lawyers, bankers, auditors and insurers who provide consultancy, legal, insurance and accounting services;
- HM Revenue & Customs, regulators and other authorities to whom we are required to report in certain circumstances;
- Third parties to whom we interact in relation to the sports at the Dean either due to their statutory obligations or to ensure the smooth running of Dean in relation to the sports played (including:- insurance providers, Health & Safety Executive, Disclosure Scotland, and Police Scotland for the purposes of safeguarding children, Scottish Squash, the Lawn Tennis Association and Tennis Scotland).

In the event that we do share personal information with external third parties, we will only share such personal information strictly required for the specific purposes and take reasonable steps to ensure that recipients shall only process the disclosed personal information in accordance with those purposes. We will not share any of the information you provide for any purpose with any third parties for marketing purposes.

Data security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

Retention

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

Your Privacy Rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data. You have the right to:

- Request access to your personal data (commonly known as a "subject access request").
- Request correction of the personal data that we hold about you.
- Request erasure of your personal data.
- Object to processing of your personal data where we are relying on a legitimate interest.

- Request restriction of processing of your personal data. Request the transfer of your personal data to you or to a third party.
- Withdraw consent at any time where we are relying on consent to process your personal data.

If you wish to exercise any of the rights set out above, please contact the Data Privacy Committee Member.

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances. We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). We may also contact you to ask you for further information to clarify your request.

We try to respond to all legitimate requests within one month, although it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

Any requests received by Dean will be considered under applicable data protection legislation. If you remain dissatisfied, you have a right to raise a complaint with the Information Commissioner's Office at www.ico.org.uk