

## **GTC Privacy Policy**

### **1. Introduction and about us**

This privacy notice explains how Guernsey Tennis Centre Limited referred to in this privacy notice as "the Guernsey Tennis Club or GTC" (or "we", "our", "us") – collects and uses personal information about you during and after your relationship with us.

This privacy notice gives a general overview of how the GTC processes personal data but you may receive more detailed information about data protection (including separate privacy notices) depending on the different ways you interact with us.

GTC is registered with the Office of the Data Protection Commissioner under registration number 59340. The GTC is subject to the Data Protection (Bailiwick of Guernsey) Law 2017, which came into effect on 25 May 2018.

### **2. Data protection principles**

We will comply with the data protection law. This says that the personal information we hold about you must:

1. Be used lawfully, fairly and in a transparent way.
2. Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
3. Relevant to the purpose we have told you about and limited only to those purposes.
4. Accurate and kept up to date.
5. Kept only as long as necessary for the purposes we have told you about.
6. Kept securely.

### **3. The categories of personal data we collect**

Personal data, or personal information, means any information relating to an identified or identifiable individual. It does not include data where no natural person can be identified from the data.

We may collect, store and use the following categories of personal information about you: your name and contact information (such as your home and/or business address (as applicable), email address and telephone number, and including a parent's or guardian's contact details (for example, for GTC members who are children, where our communications are sent to their parent), records of communications and interactions we have had with you by various means, basic biographical information including your date of birth and gender (where relevant) and financial information including bank account details (used for accepting payments from you or making them to you, as applicable).

In addition, we may collect the following personal information (depending on how you interact with us):

For GTC members:

Wimbledon ballot entry information;  
Competitions entered;  
Performance, match-play and training-related data;  
Rankings and ratings;  
Dietary requirements and other information relevant for training or competition arrangements; and/or  
Medical records and injury information.

For website users: Information provided through our website, including in messages and forms, for example forms for updating communication and marketing preferences.

#### **4. How we collect personal data**

We collect your personal information directly from you - for example, through the booking of a resource (block bookings, booking a court, etc.), booking a course or lessons (coaching), purchasing or renewing membership or booking an activity or event. We will collect the data to enable us to deal with your enquiry or provide you with the relevant services.

We may also collect information from someone else acting on your behalf - for example where a parent or guardian has purchased a membership or course for a child.

We also use cookies and collect IP addresses (an IP address is a number that can uniquely identify a specific computer or other network device on the internet).

We may sometimes collect information from third parties, such as the LTA.

We also collect certain personal data by automated means such as CCTV monitoring.

On rare occasions, we may receive information about you from others who are not acting on your behalf (for example, where someone makes a complaint about you which we then investigate).

By creating it ourselves, for example when we produce match reports from watching players compete at events.

#### **5. Our basis for processing personal data and the purposes for which we use it**

##### *Performance of contracts*

To perform the services you have requested on acceptance of the terms and conditions of the GTC and any other agreements which we enter into with you from time to time. For example to:

- process court or other resource bookings
- process membership transactions

- process coaching sessions, course and programme bookings
- set up and process competition data
- set up coaches or volunteers to run coaching programmes
- process Wimbledon LTA Ballot entries (your entries are only shared with the LTA if you are successful in obtaining tickets through the club ballot)
- fulfilment of merchandise or other club orders

### *Compliance with our legal obligations*

In some cases, we need to process your personal data in order to comply with our legal obligations, for example we need to process your personal data in order to comply with health and safety legislation, assist with investigations by police and/or other competent authorities.

### *Legitimate interests*

In other cases, the GTC has 'legitimate interests' in processing personal information about individuals we interact with. We have many such interests, including commercial interests and those with a wider public benefit. For example, we need to process personal data in pursuit of our legitimate interests in order to organise competitions and major events, and process and publish results and ensure the security of GTC premises, including capturing individuals' images using CCTV monitoring. Where the GTC relies on legitimate interests as the legal basis for processing personal data, it has considered whether or not those interests are overridden by the interests or fundamental rights or freedoms of the individuals whose data are being processed and concluded that the processing is, on balance, fair.

### *Consent*

The GTC may also process your personal data on the basis of consent you give, for example to send you certain direct marketing communications, sending you club news and details of GTC events.

### *Processing special categories of data*

Special categories of sensitive data such as medical information requires higher levels of protection. We need to have further justification for collecting, storing and using this type of personal information. The provision of medical information is optional, and we only process this personal information where it is required by a venue or coach to improve your user experience of the course, session or programme provided.

## **6. Who we may share your data with**

Personal information collected and processed by GTC may be shared with the following recipients, or categories of recipients, where necessary:

Someone acting on your behalf, for example a parent or guardian who has purchased Membership, coaching course or programmes for you as their child.

Competition organisers and officials involved in competitions you are taking part in.

Our suppliers, where they process data on your behalf; For example payment providers PARSEQ who process your membership payments and Omakisoft who GTC uses as a provider for our Club Management software.

Typically, the GTC will not transfer your personal data to countries outside the European Economic Area (EEA). On the limited occasions when this does occur (for example, because your personal data is stored on an IT system hosted outside of the EEA), we ensure that any such transfer meets the requirements of GDPR, for example because it is necessary for the provision of our products or services to you or for the establishment, exercise or defence of legal claims. You can obtain more details of the protection given to your personal data when it is transferred outside the EEA by contacting us using the details below.

## **7. How long we will store your data**

We may retain your personal data for as long as is necessary to fulfil the purposes set out in this privacy notice. We will only retain your personal information for as long as necessary to fulfil the purpose we collected it for, including the purpose of satisfying any legal, accounting or reporting requirement of the data controller. To determine the relevant 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 purpose for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements. Once you terminate your membership, your personal data will be deleted, suppressed or anonymised, as applicable, save that we will retain comprehensive details of player rankings, ratings and results for archiving purposes in the public interest, or historical or statistical purposes.

## **8. Your rights in relation to your personal data**

Under the Data Protection (Bailiwick of Guernsey) Law 2017, you have the right to:

obtain access to, and copies of, the personal data that we hold about you;

require us to correct the personal data we hold about you if it is incorrect;

require us to erase your personal data in certain circumstances;

require us to restrict our data processing activities in certain circumstances;

receive from us the personal data we hold about you which you have provided to us, in a reasonable format specified by you, including for the purpose of your transmitting that personal data to another data controller; and

to object, on grounds relating to your particular situation, to any of our particular processing activities where you feel this has a disproportionate impact on you; and

If you want to verify, review, correct or request measure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact Lara Watkins in writing. Please note that the rights referred to above are not absolute, and we may be entitled to refuse requests where exceptions apply.

You will not have to pay a fee to access your personal information (Or exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances. We may need to request specific information from you to help us confirm your identify and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

Right to withdraw consent: in the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for specific purses, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent please contact Andy Privett. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purposes or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

If you are not satisfied with how we are processing your personal data, you can complain to the Office of the Data Protection Commissioner, Guernsey (or to any authority established pursuant to the Data Protection (Bailiwick of Guernsey) Law 2017). You can also find out more about your rights under the data protection legislation from the Guernsey Data Information Commissioner's Office website available at: [www.dataci.org](http://www.dataci.org)

## **9. Contacts**

If you have any queries about this privacy policy or how we process your personal data, or if you wish to exercise your legal rights, you may contact Andy Privett, Centre Manager, on [andy@guernseytennisclub.com](mailto:andy@guernseytennisclub.com) or by telephone on 01481 712182. You can write to him at: Guernsey Tennis Club, Longcamps, St. Sampson's, Guernsey, GY2 4UQ.

We reserve the right to update this privacy notice at any time, and we will provide you with a new privacy notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.