

Privacy Policy for Cheam Fields Club

Cheam Fields Club (the club) is committed to protecting the privacy and ensuring the security of your personal data as an individual who interacts with the club.

This Privacy Policy explains how the club collects, uses, discloses, and safeguards your personal data when you apply or become a member of the club, use the club's facilities, participate in club events, or interact with the club website(s), social media platforms, messaging apps or other services owned or controlled by the club (collectively, the club services).

The club is a data controller in respect of the personal data it processes in connection with the club services.

This Privacy Policy is designed to cover the club's operations and to comply with all applicable data protection regulations, including the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

1. Information collected by the club

The club may collect the following types of personal data:

- **Membership information**

When you apply for membership or become a member, the club collects personal data such as your name, title, address, email address, phone (including mobile) number, date of birth, gender, medical information (if you choose to provide it), emergency contact, membership type, user id and payment information (including bank details). The club may also collect information about children for whom a parent or other authorised person applies for junior membership and are their contact, that parent or authorised person and about individuals, including children, included in a family membership.

- **Information about guests and temporary members**

The club may collect personal data of guests of members and temporary members such as their name and address, email address and phone (including mobile) number.

- **Information about coaches**

The club may collect personal data of coaches such as their accreditations, qualifications, training, references and Disclosure and Barring Service ("DBS") information.

- **Information about volunteers**

The club may collect personal data about volunteers and committee members for the purposes of DBS checks and safeguarding training where appropriate.

- **Information about trustees and general committee members**

The club may collect personal data about trustees and general committee members for the purposes of fulfilling HMRC requirements, making appropriate disclosure to insurers and safeguarding.

- **Information about complaints and disciplinary matters**

The club may collect and retain personal data of individuals relating to complaints, disciplinary matters, investigations, hearings and possible breaches of club rules, codes and policies.

- **Accident reports**
The club may collect data about individuals in connection with its record of accidents that occur on its premises.
- **Usage data**
The club collects information about your use of its facilities and club services, such as bookings (including those made by another individual on your behalf), attendance at events, dietary requirements and preferences, coaching and lessons, and participation in leagues, tournaments and other competitions.
- **Communication data**
When you contact the club (via email, through the club website, social media platform or messaging app, phone or in person), the club may keep a record of that communication, including the content and metadata.
- **Website data**
If you use the club website(s), the club may collect information such as your IP address, browser type, operating system, referring URLs, pages viewed, and the dates/times of your visits. The club may also use cookies and similar tracking technologies.
- **Marketing and communication preferences**
The club collects information about your preferences for receiving marketing communications from it and how you wish to be contacted. You may update your preferences by contacting the club (see section 10 below).
- **Image data**
The club may take photos or videos during club events and with your consent, publish such photos or videos on its website(s) or social media platforms.
- **Health and medical information (special category data)**
Where the club holds health and medical information (which is classified as special category data under the UK GDPR), it is so as to comply with the specific requirements for such data under the GDPR.

Where you provide medical information for yourself or a junior member in your membership application the club will record that information and the information for a junior member will be available to the coaches who run the Saturday morning coaching programme.

In specific circumstances such as participation in certain fitness programmes or if you inform the club of a medical condition, the club may collect health-related information. that will be used to ensure the programme is appropriate for you or adjustments are made to the programme.
- **Financial data**
The club may collect and record financial information from you where you make a payment, purchase or donation, or request reimbursement of expenses.

2. How the club uses your personal data

The club may use your personal information for the following purposes:

- **Membership management**
To process your membership application or a junior member for whom you are the parent or authorised contact, manage your or their account and provide you or them with membership benefits and services. (Lawful basis: **Contract**)
- **Management of guests and temporary members**
To record and verify the use of club facilities by guests and temporary members. (Lawful basis: **Contract, Legitimate Interests** – to ensure security of club premises and compliance with club rules)
- **Service provision**
To allow you to, or on behalf of a junior member for whom you are the parent or authorised contact to, book and play on courts and rinks, register for and attend events and lessons and coaching programmes, and participate in leagues and tournaments. (Lawful basis: **Contract**)
- **Communication**
To communicate with you about your membership or the membership of a junior member for whom you are the parent or authorised contact, club news, events, updates, and important information related to club services. (Lawful basis: **Contract, Legitimate Interests** - for general club communications)
- **Improving club services**
To analyse usage patterns and trends to improve club facilities, services, club services, website(s), social media platforms, communications and advertising. (Lawful basis: **Legitimate Interests** - improving club services for members)
- **Marketing and promotions**
With your consent, to send you promotional materials and information about club events, offers and services that may be of interest to you. (Lawful basis: **Legitimate interests** – managing its function as a membership club to provide facilities for and generally promote, encourage and facilitate the playing of tennis and bowls and participatiassociated social activities in the local area)
- **Security and safety**
To ensure the health, safety and security of club members, staff and facilities. (Lawful basis: **Legitimate Interests** - ensuring the safety and security of club premises and health, safety and security of individuals)
- **Safeguarding**
To comply with the club's safeguarding obligations to children and vulnerable adults. (**Legal obligation** and **Legitimate Interests** - ensuring that all those who work with children and vulnerable adults at the club have a current DBS check and have appropriate training)
- **Legal compliance**
To comply with applicable laws, regulations and legal processes. (Lawful basis: **Legal obligation**)

- **Internal operations**
For the club's internal administrative purposes, such as record-keeping, reporting its privacy policy. (Lawful basis: **Legitimate Interests** - efficient management of the club)
- **Processing special category data (such as health information)**
For the club's internal administrative purposes, such as record-keeping, reporting and research and statistical analysis about who is using the club's facilities. (Lawful basis: **Legitimate Interests** - efficient management of the club)

3. How the club shares your personal data

The club may share your personal data with the following categories of recipients:

- **Service providers**
The club may share data with third-party service providers who assist the club in operating its business, such as payment processors (operating within the UK or with appropriate safeguards in place), website hosting providers, database providers including facility and programme/event booking functionality (such as Clubspark and Bowls Surrey), email marketing services (ensuring compliance with UK data protection laws) and IT support. These providers are subject to contractual obligations to process your data only in accordance with instructions from those authorised to give instructions by the general committee of the club and with applicable data protection laws. Where you use the system, software, website or platform of the third party service provider, you will be subject to the terms and conditions of use of such provider and its privacy policy will describe how it processes your data.
- **Event organisers and partners**
If you participate in events or coaching or other programmes organised in partnership with third parties (based within the UK or with appropriate safeguards), the club may share relevant data with those third parties for the purpose of event, competition or programme administration.
- **Governing bodies and affiliated organisations**
The club may share your personal data with relevant governing bodies and organisations to which the club is affiliated to the extent necessary.
- **Other members**
In certain contexts, such as league or tournament participation, limited information (such as name, email address and phone/mobile number and ranking) may be shared with other members involved in the same activity.
- **Legal authorities**
The club may disclose your data to legal authorities, regulatory bodies, or law enforcement agencies if required by law or legal process, or if the club believes it is necessary to protect its rights, property or safety, or the rights, property or safety of others.
- **Business transfers**
In the event of a merger, acquisition or sale of all or a portion of club assets, your data may be transferred to the acquiring entity, subject to the terms of this Privacy Policy or a new policy that you will be informed of.

4. Data security

The club has implemented appropriate technical and organisational measures designed to protect your personal data against accidental or unlawful destruction, loss, alteration, unauthorised disclosure, or access. The general committee of the club regularly reviews and updates club security measures.

5. Data retention

The club will retain your personal data for no longer than is necessary for the purposes for which it was collected. This means that the retention period will vary depending on the type of data and the reason for its collection. For example:

- Membership data will typically be retained for the duration of your membership and for a reasonable period thereafter to manage club records, handle any membership-related queries, determine whether an individual has previously been a member of the club and reason for leaving the club (if known), and comply with legal obligations.
- Usage data may be retained for a longer period for statistical analysis and service improvement, in an anonymised or pseudonymised form where possible.
- Marketing data will be retained until you withdraw your consent or the club determines that it is no longer relevant.

The general committee of club is responsible for determining internal data retention policies and schedules that govern how long the club keeps different types of personal data.

6. Your rights under the UK GDPR

Under the UK GDPR, you have several rights regarding your personal data as set out in the UK GDPR:

- **The right to be informed**
You have the right to be provided with clear and transparent information about how the club processes your personal data, which is what this Privacy Policy aims to do.
- **The right of access**
You have the right to request access to the personal data the club holds about you and to receive a copy of it, along with other information such as the purposes of the processing.
- **The right to rectification**
You have the right to request that the club corrects any inaccurate or incomplete personal data it holds about you without undue delay.
- **The right to erasure (“right to be forgotten”)**
You have the right to request the deletion or removal of your personal data where there is no compelling reason for its continued processing. This right is not absolute and applies in specific circumstances.
- **The right to restrict processing**
You have the right to request the restriction of the processing of your personal data in certain circumstances, such as where the accuracy of the data is contested or the processing is unlawful.
- **The right to data portability**
You have the right to receive your personal data in a structured, commonly used, and machine-readable format and to transmit that data to another controller without hindrance from the club, where the processing is based on your consent or a contract and is carried out by automated means.

- **The right to object**
You have the right to object to the processing of your personal data in certain circumstances, including for direct marketing purposes or where the processing is based on our legitimate interests.
- **Rights in relation to automated decision making and profiling**
You have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning you or similarly significantly affects you, unless certain exceptions apply.
- **The right to withdraw consent**
Where the club relies on your consent to process your personal data, you have the right to withdraw that consent at any time. Withdrawing your consent will not affect the lawfulness of processing based on consent before its withdrawal.

To exercise any of these rights, please contact the club using the contact information provided below. The club will respond to your request without undue delay and in any event within one month of receipt of your request (although this may be extended in appropriate cases). We may require you to verify your identity before responding to your request.

7. Third-party websites and services

The club's website or communications may contain links to third-party websites or services that are not operated by the club. The club is not responsible for the privacy practices of these third parties. The club recommends that you review the privacy policies of any third-party websites or services you visit.

8. Children's privacy

Club services are generally not directed towards children under the age of 18. The club does not knowingly collect personal data from children without obtaining verifiable parental consent in accordance with the UK GDPR. If you are a parent or guardian and believe that your child has provided the club with personal data without your consent, please contact the club immediately, and steps will be taken to delete the information.

9. Changes to this privacy policy

The club may update this Privacy Policy from time to time to reflect changes in its practices, legal requirements or guidance issued by the Information Commissioner's Office (ICO). The club will post any revised Privacy Policy on its website(s). Where significant changes are made, the club may also notify you by email. The club recommends that you review this Privacy Policy periodically.

10. Contact the club and your right to complain

If you have any questions, comments, concerns or requests regarding this Privacy Policy or club data protection practices, please contact the club at:

Cheam Fields Club (fao the chair/club secretary)
Address: 30 Devon Road, Cheam, Sutton SM2 7PD
Email: cheamfields@gmail.com

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues. The ICO's contact details can be found on their website (www.ico.org.uk).