

Introduction

Welcome to The West Hants Club's Privacy Policy. The West Hants Club respects your privacy and is committed to protecting your personal data. This Privacy Policy will inform you as to how we look after your personal data when you visit our website (regardless of where you visit it from), and tell you about your privacy rights and how the law protects you. Please use the Glossary to help understand the meaning of certain terms.

1. Important information and who we are

Purpose of this Privacy Policy

This Privacy Policy aims to give you information on how The West Hants Club collects and processes your personal data through your use of our website and our bookings App called Elite Live ("the App"), including any data you may provide to us.

This website is not intended for children, but we offer services designed for children. Therefore, we are aware that we must be extra cautious when processing personal information. We anticipate and assume that we will be collecting personal information only from parents or guardians. If you are under the age of 13, you may only use our services if you have the consent of a parent or guardian who will provide personal information on your behalf.

It is important that you read this Privacy Policy together with any other privacy policy or fair processing policy we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This Privacy Policy supplements other notices and privacy policies and is not intended to override them.

Controller

The West Hants Club is the controller and responsible for your personal data (collectively referred to as The West Hants Club, "we", "us" or "our" in this Privacy Policy).

We have appointed a data privacy manager who is responsible for overseeing questions in relation to this Privacy Policy. If you have any questions about this Privacy Policy, including any requests to exercise your legal rights, please contact the data privacy manager using the details set out below.

Contact details

If you have any questions about this Privacy Policy or our privacy practices, please contact our data privacy manager in the following ways:

Full name of legal entity: The West Hants Lawn Tennis Company (Bournemouth) Limited.

Email address: info@westhants.co.uk

Postal address: The West Hants Club, Roslin Road South, Bournemouth, BH3 7EF

Telephone number: 01202 519455

Should you have a complaint as to how we are handling your data, please contact us in the first instance. You also have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK regulator for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO, so please contact us in the first instance.

Changes to this Privacy Policy and your duty to inform us of changes

We keep our Privacy Policy under regular review.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

Third-party links

This 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 and are not responsible for their privacy statements. When you leave our website, we encourage you to read the Privacy Policy of every website you visit.

2. 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).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- **Identity Data** includes first name, maiden name, last name, username or similar identifier, marital status, title, date of birth, and gender.
- **Contact Data** includes billing address, postal address, email address, and telephone numbers.
- **Financial Data** includes bank account, payment card, and direct debit details and any applicable benefit allowance documentation.
- **Transaction Data** includes details about payments to and from you and details of services you have purchased from us.
- **Technical Data** includes internet protocol (IP) address, your login data, 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.
- **Profile Data** includes your username and password, purchases, bookings or orders made by you, your interests, preferences, feedback and survey responses, and competition rankings.
- **Usage Data** includes information about how you use our website and services.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preference, and records of communications and interactions we have had with you.
- **Image and Likeness Data** includes as captured in photographs and videos while on our premises.

We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data could be derived from your personal data but is not considered personal data in law as this data will not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this Privacy Policy.

We may collect Special Categories of Personal Data about you (for example, information about your health). We do not collect any information about criminal convictions and offences.

If you fail to provide personal data

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 services). In this case, we may have to cancel a service you have with us but we will notify you if this is the case at the time.

3. How is your personal data collected?

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

- **Direct interactions.** You may give us your Identity, Contact, and Financial Data by filling in forms or by corresponding with us by post, phone, email, or otherwise. This includes personal data you provide when you:
 - submit an application for membership or renew your membership;
 - create an account on our website;
 - download, or update your information within the App;
 - request marketing to be sent to you;
 - enter a competition, promotion, or survey;
 - give us feedback or contact us via our website;
 - attend one of our social events;
 - sign up for a course or lessons; and/or
 - when entering our leagues and tournaments.

Automated technologies or interactions. As you interact with our website, we will automatically collect Technical Data about your equipment, browsing actions, and patterns. We collect this personal data by using cookies and other similar technologies. Please see our cookie policy: <https://www.westhants.co.uk/cookie-policy>.

Whatsapp messenger groups. The West Hants Club does not have any Whatsapp messenger groups. Any unofficial groups are therefore not covered within this Privacy Policy.

Third parties or publicly available sources. We will receive personal data about you from various third parties and public sources including:

- Identity and Contact Data from family members or your coach.
- Identity and Contact Data from publicly available sources (such as social media platforms).
- Your Lawn Tennis Association profile.

4. How we use your personal data

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests (or those of a third party), and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal obligation.

To find out more about the types of lawful basis that we will rely on to process your personal data, please go to the Glossary.

Generally, we do not rely on consent as a legal basis for processing your personal data, although we will get your consent before sending third-party direct marketing communications to you via post, email, or text message. You have the right to withdraw consent to marketing at any time by contacting us.

Purposes for which we will use your personal data

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register you as a new member or to renew your membership	(a) Identity (b) Contact (c) Financial	Performance of a contract with you
To process and deliver our services including to: (a) Manage payments, fees and charges (b) Collect and recover money owed to us (c) Fulfil orders for services, such as court bookings (d) Communicate about leagues/tournaments/social events (e) Monthly Newsletter	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to recover debts due to us)
To manage our relationship with you which will include: (a) Notifying you about changes to our terms or Privacy Policy (b) Asking you to leave a review or take a survey	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated and to study how members use our services).
To enable you to partake in a prize draw, competition, or complete a survey.	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications	a) Performance of a contract with you (b) Necessary for our legitimate interests (to study how members use our services, to develop them and grow our club)
To administer and protect our club and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting, and hosting of data)	(a) Identity (b) Contact (c) Technical	(a) Necessary for our legitimate interests (for running our club, provision of administration and IT services, network security, to prevent fraud, and in the context of a business reorganisation or group restructuring exercise) (b) Necessary to comply with a legal obligation

<p>To administer and protect our club and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting, and hosting of data)</p>	<p>(a) Identity (b) Contact (c) Technical</p>	<p>Necessary for our legitimate interests (to study how members use our services, to develop them, to grow our club, and to inform our marketing strategy)</p>
<p>To use data analytics to improve our website, services, marketing, member relationships, and experiences</p>	<p>(a) Technical (b) Usage</p>	<p>Necessary for our legitimate interests (to define types of members for our services, to keep our website updated and relevant, to develop our club, and to inform our marketing strategy)</p>
<p>To make suggestions and recommendations to you about services that may be of interest to you</p>	<p>(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile (f) Marketing and Communications</p>	<p>Necessary for our legitimate interests (to develop our services and grow our club)</p>
<p>Photographs / videos</p>	<p>(a) Identity (b) Profile (c) Marketing and Communications (d) Image and Likeness</p>	<p>Necessary for our legitimate interests (to inform our marketing strategy)</p>
<p>To install the App and register you as a new App user</p>	<p>(a) Identity (b) Contact (c) Profile</p>	<p>(a) Performance of a contract with you</p>

Marketing

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising.

Promotional offers from us

We may use your Identity, Contact, Technical, Usage, Profile, and Image and Likeness Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which services and offers may be relevant for you (we call this marketing).

You will receive marketing communications from us if you have requested information from us, or purchased goods or services from us, and you have opted in to receiving that marketing.

Third-party marketing

We will get your express opt-in consent before we share your personal data with any third party for marketing purposes.

Opting out

You can ask us to stop sending you marketing messages at any time by logging into the members area of our website and checking or unchecking relevant boxes to adjust your marketing preferences, or by contacting us at any time.

Please contact us if you do not consent to us taking photographs and/or videos of you whilst on our premises. Parents are responsible for opting children under 18 out. To opt out, please email info@westhants.co.uk.

Where you opt out of receiving marketing messages, this will not apply to personal data provided to us as a result of a service purchase or experience, or other transactions.

Cookies

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly. For more information about the cookies we use, please see <https://www.westhants.co.uk/cookie-policy>.

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.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

5. Disclosures of your personal data

We may share your personal data with the parties set out below for the purposes set out in the table Purposes for which we will use your personal data above:

- External Third Parties as set out in the Glossary.
- Third parties to whom we may choose to sell, transfer or merge parts of our club or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our club, then the new owners may use your personal data in the same way as set out in this Privacy Policy.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes, and only permit them to process your personal data for specified purposes and in accordance with our instructions.

6. International transfers

We do not transfer your personal data outside the UK.

7. 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. In addition, we limit access to your personal data to those employees, agents, contractors, and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

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.

8. Data retention

How long will you use my personal data for?

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting, or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect of our relationship with you.

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, regulatory, tax, accounting, or other requirements.

By law we have to keep basic information about our members (including Contact, Identity, Financial, and Transaction Data) for six years after they cease being members for tax purposes.

In some circumstances, you can ask us to delete your data: see your legal rights below for further information.

In some circumstances, we will anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

9. Your legal rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data. Please see the Glossary for more information on your rights.

If you wish to exercise any of these rights, please contact us.

No fee usually required

You will not usually 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 could 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). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally, it could 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.

10. Glossary

LAWFUL BASIS

Legitimate Interest means the interest of our club in conducting and managing our club to enable us to give you the best service and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us.

Performance of Contract means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

Comply with a legal obligation means processing your personal data where it is necessary for compliance with a legal obligation that we are subject to.

THIRD PARTIES

External Third Parties

- Service providers based in the United Kingdom who provide IT and system administration services, including coaches, and any provider of membership management services.
- Professional advisers acting as processors or joint controllers including lawyers, bankers, auditors and insurers based in the United Kingdom who provide consultancy, banking, legal, insurance, and accounting services.
- HM Revenue & Customs, regulators and other authorities acting as processors or joint controllers based in the United Kingdom who require reporting of processing activities in certain circumstances.

YOUR LEGAL RIGHTS

You have the right to:

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 and to check that we are lawfully processing it.

Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

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 successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully, or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

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 as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios:

- If you want us to establish the data's accuracy.
- Where our use of the data is unlawful but you do not want us to erase it.
- Where you need us to hold the data even if we no longer require it as you need it to establish, exercise, or defend legal claims.
- You have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use, or where we used the information to perform a contract with you.

Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain services to you. We will advise you if this is the case at the time you withdraw your consent.