



# Queens Park Tennis Club CIC

## Privacy Notice – pay & play non-members

### **Who We Are**

“We” are Queens Park Tennis Club CIC (company number 11398197) and our registered office is at The Pavilion, East Drive, Brighton BN2 0BQ.

We are committed to protecting your personal data and respecting your privacy. We comply with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018, and we are the data controller for the purposes of UK data protection legislation.

Please note that links on our website may take you to external websites which are not covered by this notice. We recommend that you check the privacy notices of these websites before submitting any personal information to them. We will not be responsible for the content, function or information collection policies of these external websites.

### **What personal information do we collect?**

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). There are certain types of more sensitive personal data (known as “Special Categories of Personal Data”) which require a higher level of protection. We do not collect any sensitive data from non-members.

### ***Information you provide to us***

We may receive personal information about you whenever you:

- Contact us (by phone, text, email or post).
- Hire or use one of our tennis courts.
- Make a compliment or a complaint.
- Make an application to our membership Bursary Fund scheme.

This information may include:

- Information about your identity, such as your full name, title and date of birth.
- Contact information, such as your postal address, email address and telephone number.
- Payment information or bank details, for example, to process court bookings and court cancellation refunds, purchases in our clubhouse, and any other financial transactions.

### **Information collected through our website**

*Contact via the website (email - there is no contact form)*

We retain any information sent to us through email via our website for the sole purpose of replying to your enquiry.

*Embedded content from other websites*

Our website uses Google's Maps API. When the maps are loaded, your IP address is sent to Google to determine your location. Read Google's Privacy Policy

*Analytics*

Our web host, GoDaddy provides us with basic, anonymous website visitor numbers from their servers. GoDaddy does not use cookies to provide this data.

*What third parties we receive data from*

We do not receive any data from third parties. We do not share your data with any third parties other than those described above.

*How we protect your data*

Your data is stored in a secure database. Standard security measures have been taken to protect the data, including strong passwords, and two-factor authentication where relevant.

### **CCTV**

We operate a CCTV surveillance system within and outside our clubhouse and directed at our 6 tennis courts. We use CCTV for the prevention and detection of crime and for protecting the safety of individuals, and the security of premises. Any audio capabilities in our system are switched off by default. For further information, please read our CCTV Surveillance System Policy, which can be found here: <https://qptc.co.uk/club-policies/>

### **Lawful Basis for Processing**

Every organisation must be clear on their lawful reasons for processing personal data. We rely on:

- Contract – court bookings.
- Legal obligation – for compliance with health and safety and security requirements.
- Legitimate interests – to operate effectively and maintain a safe and secure environment.
- Consent – where we are required to have your consent.
- Vital interest – to safeguarding you and others.

### **How we use your personal data**

We have set out below, a description of the ways we may use your personal data, and which of the legal bases we rely on to do so.

<b>Purpose/Activity</b>	<b>Type of data</b>	<b>Lawful basis for processing including basis of legitimate interest</b>
Providing a third-party online court booking system (ClubSpark) to book our tennis courts.	When you create a ClubSpark account, you provide: contact details - name, title, address, telephone number and e-mail address; date of birth; gender.	Contract  QPTC Administrators on ClubSpark can access your data and court bookings.
Security of our facilities.	CCTV footage (video recording).	Legitimate interest - for the prevention or detection of crime or disorder, apprehension and

		prosecution of offenders (including use of images as evidence in criminal proceedings), interest of public and employee Health and Safety, protection of public health and the protection of our property and assets and to ensure compliance with our policies and procedures.
Receiving and responding to compliments and complaints.	Name, phone number, email address.	Consent
Receiving and administering applications to our membership Bursary Fund scheme.	Name, phone number, email address.	Consent

### ClubSpark

QPTC CIC has enlisted the services of a third party, ClubSpark Group Ltd, to provide the online court booking system that you register with and use to book our tennis courts. They provide the software, the servers, and the booking system. They store data and provide the App security. Their relationship with QPTC CIC is as a Data Processor. ClubSpark provide their own privacy and data policy:

<https://clubspark.co/clubspark/Privacy>

### Sharing your information with third parties

We may share your data with selected third parties. For example, we may share your information with:

- GoDaddy and Google – as detailed above.
- Chisnall Comer Ismail & Co. Chartered Accountants, Maria House, 35 Millers Road, Brighton BN1 5NP to prepare our annual Financial Statements.
- Laetitia Beatty, our Finance Administrator to process financial transactions within our Xero book-keeping system.
- Lloyds Bank as our banking services provider.

### How long do we keep your personal data for?

We will only store your personal information for as long as we need it for the purposes for which it was collected. If you would like more information about exactly how long each piece of your personal data will be stored by us, please see our Data Protection Policy which includes our data retention periods:

<https://qptc.co.uk/club-policies/>

### Storing your data

Your data is stored securely in electronic systems with restricted access. We will take all steps reasonably necessary to ensure that your personal data is treated securely and in accordance with this Privacy Notice.

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

### Your Rights

You have the right to:

- Be informed, which is why we provide this Privacy Notice.
- Access your data.

- Request correction or deletion (where legally possible).
- Object to processing in certain circumstances.
- Restrict how we use your personal data.
- Complain to the Information Commissioner's Office (ICO) if you are unhappy with how we handle your data.

### **Changes to our Privacy Notice**

Any changes we make to our Privacy Notice in the future will be posted on our website and, where appropriate, notified to you by email. Please check our website frequently to see any updates or changes to our Privacy Notice: <https://qptc.co.uk/club-policies/>

### **Complaints**

If you wish to make a complaint about our collection or use of your personal data, please contact us in the first instance so that we may seek to resolve your complaint. Further information can be found in our Compliments and Complaints Policy: <https://qptc.co.uk/club-policies/>

You have the right to lodge a complaint with the ICO, the statutory body which oversees data protection law in the UK. Please visit the [ICO website](#) if you wish to lodge a complaint with the ICO.

### **Contact Us**

For any queries or to exercise your rights, contact Stephen Lee our Data Protection Compliance Lead:

Email: [stephen.lee.2@citystgeorges.ac.uk](mailto:stephen.lee.2@citystgeorges.ac.uk)

Phone: 07900582123

Address: Queens Park Tennis Club CIC, The Pavilion, East Drive, Brighton BN2 0BQ.