



## **DATA PROTECTION POLICY**

### **(Individuals other than Employees, Volunteers and Officers)**

For the purposes of the General Data Protection Regulation ("GDPR") and UK data protection laws, the controller is Kent Tennis Charitable Incorporated Organisation (the "Venue") of Avebury Road, Orpington, Kent, BR6 9SA

#### **About this document**

This privacy policy sets out the way we process your personal data pursuant to the legitimate interests of the Organisation, and we have adopted this privacy policy to make sure you are aware of how we use your data as a member of one of our registered venues or as an individual who engages or interacts with the Organisation in the course of our activity as a County Tennis Organisation.

#### **How we collect your information**

We may collect your personal data in a number of ways, for example:

- Directly from you, when you make enquiries on our website, when you provide information via the Organisation's management software or contact us by email or otherwise for any reason, or when you interact with us during your time as a member of one of our registered venues or a member of the Supporters Club or otherwise in the course of our activities, in various other ways (for example, where you enter a competition, tournament or league run by us, sign up for a course or workshop run by us or attend training provided by us or provide support financial or otherwise to us or request such support from us);
- From someone else who has provided personal data on your behalf (for example a family member or your tennis coach who has provided us with your contact details for any purpose);
- From the LTA (for example, where the LTA passes on your details to us in connection with your involvement in tennis or our activities as a County Tennis Organisation).

#### **The types of information we collect**

We may collect the following types of personal data about you, for example:

- Contact and communications information, including your contact details (including email address(es), telephone numbers and postal address(es) and records of communications and interactions we have had with you);
- Financial information, including Direct Debit details;
- Certain other information which you volunteer when engaging with the Organisation for any purpose related to our activities as a County Tennis Organisation.

We may also collect data about your health or medical conditions, where you have volunteered this, for example so that we can cater for you when you attend a social event or a course/camp or represent the Organisation in competitions.

#### **How we use personal data and the basis of processing by us:**

Personal data is processed on the basis of legitimate interests of the Organisation as a County Tennis Organisation of member venues within Kent and as a member of the LTA.

Personal data provided to us will be used for the purposes set out at the time of collection and, where relevant, in accordance with any preferences you express.

More generally, we will use your personal data for the following purposes:



- For any relevant purpose relating to the venue of which you are a member;
- Administration of tennis in Kent pursuant to our activities as a County Tennis Organisation, including the administration of competitions, leagues and tournaments.
- Fulfilment of orders for goods and services;
- Administration of the Kent Supporters Club;
- Nomination to the LTA for a pair of Wimbledon tickets;
- When you are engaged as a coach for any of the teams representing the Organisation, for the purpose of that activity;
- When you apply for financial support from any of the charitable funds established by the Organisation, for the purpose of that application;
- Research and statistical analysis about who is playing tennis in Kent or in the UK generally;
- Communication about our activities that we think may be of interest to you;
- Facilitating communication between you and employees, volunteers or officers of the Organisation and/ or others engaged with the Organisation pursuant to its activities;
- Storing your details on the software platforms we use for our online management databases or in hard copy. (Please note that your own use of the software or system is subject to the Terms and Conditions and Privacy Policy published on those sites);
- When you are selected to represent the Organisation in any competition or to undergo training:

where this is necessary for our legitimate interests (for example in increasing use of our facilities and participation in the game generally);

- Promoting the Organisation and the goods and services of third parties (for example, equipment suppliers, operators of courses including coaching courses, and organisers of tennis events) where we think this will be of interest to you;

where this is necessary for our legitimate interests as a County Tennis Organisation (or the legitimate interests of a third party), and/or where we have your consent, as applicable;

- Facilitating any sponsorship by you of the Organisation

### **Your marketing preferences**

We will always respect your wishes in respect of what type of communications you want to receive from us and how you want to receive them. There are some communications, however, that we need to send you if we have any contractual relationship with you or if you have engaged with us in our activities as a County Tennis Organisation. Examples of these essential service communications are:

- Records of transactions, such as payment receipts or Direct Debit confirmations (as applicable).
- Membership related mailings such as the registration or renewal of your own venue, notices of formal meetings.
- Information from the LTA concerning your venue's registration with them or concerning the administration of your venue.
- Communication about any competition or tournament or league which you or your venue have entered or wish to enter.

You are in control of how we communicate with you. You can update your choices and/or your contact details by contacting our Data Protection Manager:

- by email: [phil.lynch@kenttennis.org.uk](mailto:phil.lynch@kenttennis.org.uk);
- by telephone: 07401 232125;
- or by post: Kent Tennis, Avebury Road, Orpington, Kent, BR6 9SA.



### Sharing your information with others

We do not sell or share your personal data for other organisations to use other than as set out below.

Personal data collected and processed by us may be shared with the following third parties, where necessary, for example:

- Employees and volunteers of the Organisation or your own venue, for the purposes of administering your venue's membership of the Organisation and giving your venue access to the membership benefits to which they are entitled or to which you personally may be entitled.
- Our contractors and suppliers, including coaches, and any provider of membership management services.
- The LTA.
- Other County Tennis Organisations.

### How long your information is kept

We keep your personal data only for as long as necessary for each purpose we use it. For most data, this means we retain it for so long as your venue has a valid registration and for a period of six years after your last interaction with us (for accounting, tax reporting and record-keeping purposes).

### Your rights

Under certain circumstances, by law 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 information we hold about you corrected.
- 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 exercised your right to object to processing (see below).
- 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. You also have the right to object where we are processing your personal data for direct marketing purposes.
- Request the restriction of processing of your personal data. This enables you to ask us to suspend the processing of personal data about you, for example if you want us to establish its accuracy or the reason for processing it. You can also withdraw your consent, where this is the basis for our processing your data (without affecting the lawfulness of our previous processing based on consent).
- Request the transfer of your personal data to another party.

Please note that the above rights are not absolute, and we may be entitled to refuse requests where exceptions apply.

### Contact and complaints

If you have any queries about this privacy policy or how we process your personal data, or wish to make a complaint, or if you wish to exercise any of your legal rights, you may contact our Data Processing Manager:

- by email: [phil.lynch@kenttennis.org.uk](mailto:phil.lynch@kenttennis.org.uk);
- by telephone: 07401 232125;
- or by post: Kent Tennis, Avebury Road, Orpington, Kent, BR6 9SA.



**KENT**  
TENNIS

If you are not satisfied with how we are processing your personal data or dealing with your complaint, you can make a complaint to the Information Commissioner's Office. You can find out more about your rights under applicable data protection laws from the Information Commissioner's Office website: [www.ico.org.uk](http://www.ico.org.uk).