



# Dunstable Tennis Club

## GDPR and Data Privacy – Employees, Volunteers, Officers

General Data Protection Regulation (GDPR) comes into force from 25 May 2018.

For the purposes of the General Data Protection Regulation ("GDPR") and UK data protection laws, the controller is Dunstable Tennis Club (the "Venue") of Downs Road, Dunstable, Bedfordshire, LU5 4DD

### About this document

This privacy policy sets out the way we process your personal data and we've created this privacy policy to make sure you are aware of how we use your data as an employee, volunteer or officer of our tennis venue.

### How we collect your information

We may collect your personal data in a few limited ways, namely:

- From the information you provide to us when you interact with us by making an application for a job or a volunteer or other Venue position, for example when you come for an interview or when you submit a formal application to work for us and provide your personal data in application forms and covering letters, etc.;
- From third parties, for example your previous or current employers in relation to your application to work or volunteer for us;
- During the course of your employment or engagement as a volunteer or officer with us, when you or another member of staff completes paperwork regarding your performance appraisals, and as may be generated in connection with your employment or other relationship with us more generally.

### The types of information we collect

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

- Contact and communications information, including your contact details (including email address(es), telephone numbers and postal address(es), contact details for your family members and next of kin and records of communications and interactions we have had with you);
- Biographical, educational and social information, including your name, title, gender, nationality and date of birth, your image and likeness, including as captured in

photographs taken for business purposes, details of your education and references from your institutions of study.

- Financial information, including your bank account number(s), name(s) and sort code(s) (used for paying your salary and processing other payments); your tax status (including residence status); Gift Aid declaration information, where relevant.
- Work-related information, including details of your work history and references from your previous employer(s); your personal data captured in the work product(s) you create while employed by or otherwise engaged to work for us; details of your professional activities and interests; your involvement with/membership of industry bodies and professional associations; information about your professional life after leaving us, where relevant (for example, where you have asked us to keep in touch with you).
- Certain other information which you volunteer when making use of your benefits (for example, when making court bookings or making use of other Venue facilities).

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 Venue social event or a course/camp.

## **How we use personal data**

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:

- Administering job, volunteer or officer applications and, where relevant, offering you a job or other positions with us;
- Carrying out due diligence checks on you during the application process for a role, including by checking references in relation to your education and your employment history;
- Once you are employed or engaged by us in any capacity, for the performance of the contract of employment (or equivalent agreement) between you and us;
- To pay you and to administer benefits (including pensions) in connection with your employment or other engagement with us;
- For tax purposes, including transferring it to HM Revenue and Customs to ensure that you have paid appropriate amounts of tax, and in respect of any Gift Aid claims, where relevant;
- Contacting you or your family members and 'next of kin' for business continuity purposes, to confirm your absence from work, etc.;
- Monitoring your performance in your work, including in performance appraisals;
- Monitoring and recording telephone calls, emails and internet use in accordance with our IT policies and for compliance with our legal obligations;
- For security purposes, including by operating security cameras in various locations at our premises;
- For preventing and detecting crime, and to investigate complaints and grievances;
- Dealing with legal claims and requests, including those made under data protection law, or requests for disclosure by competent authorities;
- For other HR-related administrative purposes, for example to update you about changes to your terms and conditions of employment or engagement;
- External and internal audit and record-keeping purposes;
- Sharing your personal data with the LTA, county tennis associations and other venues for reasonable purposes in connection with the operation of the Venue.

## The basis for processing your information

We may process your personal data for the above purposes because:

- It is necessary for the performance of a contract with you (your employment contract or equivalent) or in order to take steps at your request prior to entering into such a contract;
- It is necessary for our or a third party's legitimate interests. Our "legitimate interests" include our reasonable interests in the operation of the Venue, in accordance with all relevant legal requirements;
- It is necessary to protect your or another person's vital interests (in certain limited circumstances, for example where you have a life-threatening accident or illness in the workplace and we have to process your personal data in order to ensure you receive appropriate medical attention);
- It is necessary for the establishment, exercise or defence of legal claims (for example, to protect and defend our rights or property);
- We have your specific or, where necessary, explicit consent to do so (in certain limited circumstances, for example where you provide details of your racial or ethnic origin so that we can monitor our compliance with equal opportunities legislation);
- for compliance with our legal obligations (e.g. to exercise or perform any right or obligation conferred or imposed by law in connection with employment or for the prevention and detection of crime, and in order to assist with investigations (including criminal investigations) carried out by the police and other competent authorities).

## Sharing your information with others

We may share your personal data with certain third parties for the purposes set out in this privacy policy. We may share some personal data with third parties including:

- Other employees, volunteers, agents and contractors where there is a legitimate reason for their receiving the information, including third parties where we have engaged them to process data on our behalf as part of administering payroll services, the provision of benefits including pensions, etc.;
- Internal and external auditors and legal advisers;
- When we are legally required to do so (by a court, government body, law enforcement agency or other authority of competent jurisdiction), for example by HM Revenue and Customs;
- To a third party acquirer or investor where there is a reorganisation or sale of all or part of our business (or during negotiations for such a sale or reorganisation). In such a case we will take appropriate measures to ensure the security of your personal data;
- To the LTA and county tennis associations. 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 regardless of your marketing preferences in order for us to fulfil our contractual obligations to you as a member of our Venue. 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 your membership renewal reminder, notices of formal meetings and information about venue closures and holiday opening hours.

**You are in control of how we communicate with you.**

**You can update your choices and/or your contact details by contacting our club Chairman**

Chairman: Graham Morgan

Email: [info@dunstabledennisclub.com](mailto:info@dunstabledennisclub.com)

### **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 membership data, this means we retain it for so long as you have a valid Venue membership 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 if you wish to exercise any of your legal rights, you may contact our

Data Protection Officer: Mark Cant

Email: [info@dunstabletennisclub.com](mailto:info@dunstabletennisclub.com)

If you are not satisfied with how we are processing your personal data, you can make a complaint to the Information Commissioner. 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).