



## Privacy Policy – Including Website Use

This privacy notice aims to give you information on how Tower Hamlets Tennis Ltd (THT) collects and processes your personal data through your use of this website, including any data you may provide when you use our website and apps, purchase services from us, and contact us over the phone or by email.

It is important that you read this privacy notice together with any other privacy notice or fair processing notice 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 notice supplements the other notices and is not intended to override them.

For all of our services, the data controller, the company that is responsible for personal data, is Tower Hamlets Tennis Ltd.

You can contact us by emailing [info@towerhamletstennis.org.uk](mailto:info@towerhamletstennis.org.uk) . If you'd prefer, our postal current postal address is displayed on our Companies House Record.

If you have any questions about this privacy notice, including any requests to exercise your legal rights, you can contact us using the details set out in this notice.

### Changes to the privacy notice

We may change this privacy notice from time to time, to reflect how we are processing your data.

If we make significant changes, we will make this clear on our website or by such other means of contact such as email, so that you are able to review the changes before continuing to use THT services.

This version of the privacy notice was last updated on the date set out at the bottom of the page and historic versions can be obtained by contacting us.

### Third-party links

Our 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 notice of every website you visit.

## THE PERSONAL DATA WE COLLECT ABOUT YOU

We collect, use, store and transfer different kinds of personal data about you to enable us to manage your court and course bookings; to give you information on opening times and changes to our programme; to help us monitor and improve the services we provide and, where we are permitted to, to tell you about upcoming activities that we think you may like.



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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). THT do not electronically store any special categories of data (ethnicity or health data) that are linked to other personal information.

THT collects and processes a range of information about you. This includes, for virtually all individuals, your name and basic contact information (such as your email address and telephone number, and including a parent's or guardian's contact details (if under 18), records of communications and interactions we have had with you by various means

In addition, we can some of the following categories of personal data depending on how you interact with us:

For court booking customers:

- Payment information and details of returns or refunds, where relevant
- Court booking history

For course booking customers:

- Payment information and details of returns or refunds, where relevant

For coaches and volunteers :

- Accreditations, qualifications and training
- DBS information (criminal records checks)
- Disciplinary and safeguarding information, where relevant
- Curriculum Vitae
- Communications between THT and yourself to manage the relationship

For website users:

- Information provided through our website, including during the course of making a booking and via feedback forms

We also collect, use and share Aggregated Data such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific venue. 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 notice.

### **If you don't provide personal data**

You don't have to give us any of your personal data but, if you don't, you are unlikely to receive our optimal customer service experience. In some cases, if you do not provide us with certain personal data, we may not be able to work with you or provide our products or



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services to you (as applicable), or it may adversely affect the provision of our services to you.

### Keeping your personal data up-to-date

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.

### HOW WE COLLECT YOUR PERSONAL DATA

We may collect your personal information in a number of ways, principally:

- Directly from you, for example when you use a contact form from the website, purchase our products or services or enter a competition
- From someone else acting on your behalf, for example when a parent or guardian has purchased a holiday camp for you as their child, or when a coach or official provides information to THT on behalf of a player.
- On rare occasions, we may receive information about you from others who are not acting on your behalf (for example, where someone makes a complaint about you which we then investigate)
- When you make enquiries on our website, or when you interact with us (for example, where you volunteer to assist with a competition, tournament or league organised by us)
- When you have informed a member of staff of any specific medical information/advisories regarding a player at a session. This information is not recorded electronically and destroyed after one time use.

### HOW WE USE YOUR PERSONAL DATA

We will use your personal data where we need to perform a contract with you, where it is necessary for our legitimate interests, where you have asked us to or where we need to comply with a legal obligation.

You will only receive marketing communications from us if you have requested information from us, purchased products or services from us or told us that we can send them to you. You can tell us that you want to stop receiving marketing communications from us at any time.

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 we need to comply with a legal or regulatory obligation.



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- 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.

**Performance of Contracts.** We will process your personal data where this is necessary for the performance of a contract with you or to take steps at your request before entering into such a contract. For example, we need to process personal data in order to comply with terms and conditions relating to the purchase of products or services including course bookings, funding and player support agreements with players, services contracts with coaches and officials, volunteer agreements and the terms and conditions applicable to the use of our website.

**Compliance with our legal obligations.** In some cases, THT needs to process your personal data in order to comply with its legal obligations. For example, we need to process personal data in order to comply with health and safety legislation, carry out DBS (criminal records) checks on coaches, officials and volunteer roles (where relevant) for safeguarding purposes, and assist with investigations by police and/or other competent authorities.

**Legitimate interests.** In other cases, THT Tennis has 'legitimate interests' in processing personal information about individuals we interact with. We have many such interests, including commercial interests and those with a wider public benefit. In essence, our principal legitimate interests are in pursuing our mission to get more people playing tennis in Tower Hamlets and managing THT in a way that promotes and safeguards the integrity of the sport.

For example we need to process personal data in pursuit of our legitimate interests in order to:

- Organise competitions and process results, including disciplinary data, records of code violations and other personal data which is necessary and required by the LTA
- Market THT products and services (including court and course bookings, performance programmes and events), and promote tennis across East London more generally
- Keep appropriate records of coaches, officials and volunteers
- Administer our development programme (for example, monitor player progress)

Where THT relies on legitimate interests as the legal basis for processing personal data, it has considered whether or not those interests are overridden by the interests or fundamental rights or freedoms of the individuals whose data are being processed and concluded that the processing is, on balance, fair.

**Consent.** THT may also process your personal data on the basis of consent you give, for example to send you certain direct marketing communications.

**Processing special categories of data.** Where we process sensitive personal data, other legal bases for processing may apply, including where our processing is necessary for the establishment, exercise or defence of legal claims, for provision of medical care and treatment, for the purposes of equal opportunities monitoring or where you have otherwise



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given us your explicit consent (for example, where coaches or officials provide us with data relating to criminal convictions and offences as part of the DBS disclosure process).

### **COOKIES**

Information may be sent to your computer in the form of an Internet “cookie” to allow the THT servers to monitor your requirements. The cookie is stored on your computer. The THT Tennis server may request that your computer return a cookie to it. These return cookies do not contain any information supplied by you.

This is necessary to allow THT to measure the usability of the system, which will help to improve the user experience of our website. Your browser software should however enable you to block cookies if you wish.

If you disable or refuse cookies, please note that some parts of the website may become inaccessible or not function properly.

### **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 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.

### **SHARING YOUR PERSONAL DATA**

We do not sell any of your personal data to any third party.

We do, however share your personal data with certain companies who play an essential part in enabling us to provide our products and services to you, such as payment providers, IT and system administration providers and others who help us run our business. You can rest assured, however, that we require all third parties to respect the security of your personal data and to treat it in accordance with the law and we do not allow our third-party service providers to use your personal data for their own purposes.

Personal information collected and processed by THT may be shared with the following recipients, or categories of recipients, where necessary:

- Someone acting on your behalf, for example a parent or guardian who has booked a service with us.



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- Our employees and volunteers (as applicable), for the purposes of providing particular products or services to you
- County or national tennis associations (LTA and Essex LTA) and/or the London Borough of Tower Hamlets, where relevant (for example, in order to resolve an issue raised by you that has been referred on to the relevant organisation/s)
- Our contractors and suppliers, where they process personal data on our behalf (for example IT consultants and hosted software providers and professional providers) including JRNI.com (booking systems provider), Mailchimp (marketing communications system), wix.com (form content)
- The Disclosure and Barring Service, and safeguarding committees, HM Revenue and Customs, the police and/or other competent authorities as applicable

Typically, THT will not transfer your personal data to countries outside the European Economic Area (EEA). On the limited occasions when this might occur, we will ensure that any such transfer meets the requirements of GDPR.

### **KEEPING YOUR PERSONAL DATA SECURE**

We're committed to keeping your personal data secure and 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.

### **HOW LONG WE WILL KEEP YOUR PERSONAL DATA FOR**

We may retain your personal data for as long as is necessary to fulfil the purposes set out in this privacy notice and/or THT's reasonable requirements. On expiry of the relevant retention period, your personal data will be deleted, suppressed or anonymised, as applicable.

### **YOUR LEGAL RIGHTS**

Under the GDPR, you have the right to:

- Obtain access to, and copies of, the personal data that we hold about you
- Require us to correct the personal data we hold about you if it is incorrect
- Require us to erase your personal data in certain circumstances
- Require us to restrict our data processing activities in certain circumstances
- Receive from us the personal data we hold about you which you have provided to us, in a reasonable format specified by you, including for the purpose of your transmitting that personal data to another data controller
- To object, on grounds relating to your particular situation, to any of our particular processing activities where you feel this has a disproportionate impact on you



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- Where our processing is based on your consent, you may withdraw that consent, without affecting the lawfulness of our processing based on consent before its withdrawal

If you would like to exercise any of these rights, please contact us in writing. Please note that these rights are not absolute and we may be entitled (or required) to refuse requests where exceptions apply.

If you are not satisfied with how we are processing your personal data, you can complain to the Information Commissioner's Office (ICO). You can also find out more about your rights under the GDPR (and other data protection legislation) from the Information Commissioner's Office website available at: [www.ico.org.uk](http://www.ico.org.uk).

### **IF YOU DO NOT PROVIDE PERSONAL DATA**

In some cases, described above, the provision of personal data is a contractual requirement, and/or a statutory requirement if you wish to engage with THT in a certain way (for example, where you wish to work as a coach, and there is a statutory requirement for us to carry out a criminal records check on you, for safeguarding purposes). In those and other cases, if you do not provide us with certain personal data, we may not be able to work with you or provide our products or services to you (as applicable), or it may adversely affect the provision of our services to you.

### **CONTACT US**

If you have any queries about this privacy notice or how we process your personal data, you may contact us:

- By email : [info@towerhamletstennis.org.uk](mailto:info@towerhamletstennis.org.uk)