**Privacy Policy: membership information**

Coolhurst has duties to respect data and this means that we are responsible for how and why members’ personal information is used. The GMC has appointed a data protection officer who can be contacted at [admin@coolhurst.co.uk](mailto:admin@coolhurst.co.uk).

We are committed to respecting members’ privacy and to complying with the Data Protection Act and any other relevant privacy laws. Our commitment to data protection principles is set out in our Data Protection Policy. This privacy policy sets out how Coolhurst collects, uses and protects personal *membership* information.

**Collection and Use of Personal Information**

Members of Coolhurst provide personal information (title, gender, first name, surname, home and work email addresses, home and mobile phone numbers, and car registration numbers) when they join the club. It is the responsibility of members to notify the club of updates to their information. Personal data of members who participate in ladder competitions, tournaments or other organised play may be posted in hard copy format on noticeboards in the clubhouse in positions easily readable both by members and by visitors to the club. Organisers of these events will consider reasonable requests to accommodate the needs of members who wish to participate, but do not wish their personal data to be visible in such a way.

The Club database holds the data for membership administration and for the booking system for tennis and squash courts. It includes the secure online payment system for paying for court reservations and for membership renewal and related purposes. Car registration number information is stored separately for the purposes of authorising use of the car park.

The membership information is stored on the club’s database and is managed by us on an IT system supplied by Globus Data UK Ltd, 24 Chiswell Street, London, EC1 4YX (www.globusdata.co.uk). The data are located on Globus’s secure servers in the UK, and Globus is responsible for maintaining servers, its operating system and data including security backups.

Members can access the database by logging in with a member ID and a User PIN code.

In addition the club has its own database for junior coaching programmes.

**Need to process data**

The Club will hold and process membership data as it is necessary for the purposes of its legitimate interests in operating as a member owned sports club, and will do so except where such interests are overridden by the interests, rights or freedoms of a member.

The club needs to use membership data

* to provide information to members
* to manage the club’s facilities, assets and finances
* to maintain compliance with club policies

in relation to matters such as

* Sporting and social activities
* Access to and management of common facilities on the estate, such as the clubhouse, the car park, the gym, the studio and the therapy rooms
* Club management matters by the General Management Committee, and constitutional matters such as information about General Meetings
* Management of tennis and squash by the relevant committees
* Membership status, such as subscription and renewal notifications

**Authorisation of use by club officials, managers, staff and others**

Access to and use of the database for these purposes is restricted to individuals who are authorised by the GMC. Others with specific functions such as IT experts or contractors, or our auditors may need to access data for relevant purposes.

**Use by members of personal data relating to other members**

Members are able to access the membership database for purposes relating to club activities, such as inviting other members to play. Members may make reasonable use of personal information to contact members they know personally for social purposes.

Members may not use member information on the database to contact members they do not know personally for purposes such as

* marketing products or services, including encouraging support for charities
* supporting political parties
* canvassing support for or opposition to the election of candidates as members of the GMC, or for the promotion of meeting resolutions, or messages concerning club management.\*\*\*

\*\*\* The Club encourages open engagement among members and has provided for wider democratic participation by way of online voting at General Meetings. There is a Coolhurst Tennis and Squash Club Bulletin Board at <https://groups.google.com/forum/#!forum/coolhurst> where members can post messages and questions about club or sports management, and engage in debate about current and upcoming issues.

**Retention and Deletion**

When members provide the club with personal information it is only retained for as long as it is needed. All personal membership information held by the club no longer required is deleted in a structured, secure and timely manner.

**Disclosure of Personal Information**

The club will only disclose membership information to lawful authorities for the purpose of investigating crime or civil wrongs; or to national or regional sports governing bodies where there is a need to do so.

**Monitoring and Recording of Calls**

We do not monitor or record calls.

**CCTV**

The club has installed and manages a number of CCTV cameras. It did so having assessed that the installation of cameras was the best solution to the problem of identifying and investigating incidents of potential criminal activity, disorderly conduct, lost or damaged property, or behaviour that would bring the club into disrepute. The club has registered its use of CCTV with the Information Commissioner’s Office. The person responsible for operating the system is the clubhouse manager who has sufficient training to understand how to operate the system and the cameras. She is the person to contact if anyone wishes to request copies of their images.

The cameras are sited both inside and outside the clubhouse, but are positioned to provide clear images and avoid so far as possible capturing external images of people not visiting the club. The club does not provide images to third parties other than law enforcement bodies.

The club only retains images for long enough to allow for any incident to come to light (eg for a theft to be noticed) and to investigate it. It selected a system that produces high quality, clear images which law enforcement bodies (usually the police) can use to investigate crime. The club can easily extract these images from the system when required. The club carries out regular checks to ensure that the system is producing high quality images.

CCTV images are stored securely and access is limited to authorised individuals. There is a sign on the clubhouse door indicating that CCTV is in operation.

**Right to Access Information**

The Data Protection Act provides people with a right of access to a copy of any personal information the club may hold about them. A person with parental responsibility for a child may access information held about their child. This is called the right of subject access.

The club reserves the right to verify the identity of the person making the request, using all reasonable means, and will do so particularly where the information requested is about a child. The club is required to provide applicants with a copy of relevant personal information within a month. If the information held is shown to be incorrect the club will make the necessary amendments.

The club reserves the right to charge a reasonable fee when a request is manifestly unfounded or excessive, particularly if it is repetitive.

**Right to object or request erasure, or restriction**

If a member wishes his or her personal data to be erased or restricted, or to object to their data being used on grounds relating to their particular situation, the club will comply with the request, but the member should be aware of the inevitable limitation on their access to sports facilities or membership rights. The club may decline comply with an objection or a request to erase or restrict data to comply with a legal obligation or for the performance of a public interest task or exercise of official authority; for public health purposes in the public interest; or for the exercise or defence of legal claims.

Where the club holds personal data of children, it will pay special attention to situations where a child requests erasure of the data (regardless of age at the time of the request).

**The Information Commissioner’s Office (ICO)**

The ICO is the public authority to which complaints or appeals can be made about data protection matters. For further information on the Data Protection Act and on the rights contained in the EU General Data Protection Regulations and how they are given effect in UK law, please visit the following website: www.informationcommissioner.gov.uk

**Approved by the Board on:**