

Dunnington Squash and Racketball Club

MEMBERS' AND USERS' PRIVACY POLICY

This Privacy Policy applies to all members and users of Dunnington Squash and Racketball Club, covering all sports played within the grounds and buildings.

For the purposes of the General Data Protection Regulation ("GDPR") and UK data protection laws, the Data Controller is the non-incorporated members' club called Dunnington Squash and Racketball Club ("the Club") of Common Road, Dunnington, York, YO19 5NG and together "DSC".

About this document

This privacy policy sets out the way we collect and process your personal data and we've created this Privacy Policy to make sure you are aware as a member or user of the Club and our facilities of how we use your personal data. This policy is effective from **1st December 2020**. We may amend and re-issue this policy at any time without prior notice to you being required.

How we collect your information

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

- Directly from you, when you fill in an application for membership of one or more of the Clubs within DSC, when you make enquiries on our website, when you provide information via our club management software or court booking systems, or when you interact with us during your time as a member or user of our facilities in various other ways (for example, where you enter a sporting competition, renew your membership, sign up for a course of coaching lessons);
- From someone else who has applied for membership or use of our facilities on your behalf (for example a family member, guardian, or a tennis or squash coach who has provided us with your contact details at your request for that purpose);
- From **England Squash** (for example, your details are passed on to us in connection with a query or complaint you have raised with them about DSC);
- From time to time you may need to provide us with evidence of identity, age or residence in order to qualify for certain subscription levels or to pay our fee, but that identity information, other than those items stated below, is not held in our membership system;
- Your photographic image may appear in pictures we display on our website;
- Your photographic image and/or your name may appear on one or more of our social media websites;
- Your video image may appear in our website camera feed of our tennis court and recreation area;
- Your video image may be recorded in our CCTV security camera system.

The types of information we collect

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

- Title, name, address, email address, telephone numbers, gender, year of birth, family discount eligibility and **England Squash membership** (where applicable). This information is collected by means of a signed membership application which is provided by you, the member, or by your parent/guardian at the time of joining the Club;
- **Information about your health or medical conditions** but only where you have volunteered this: for example so that we can consider requests regarding subscription suspensions, process injury information reasonably required by our insurers, or cater for your specific personal needs when you attend a Club social event, a playing course/camp, or a similar sporting or social activity;
- When we make a direct online payment to you from one of our banks, for example for a refund of an amount you have paid, your bank account number and sort code may be stored in our bank's secure online payment system. You may at any time ask us to delete any such personal information; **to do so you will need to apply to the relevant sports committee of the club.**
- Certain other information which you volunteer when making use of benefits specific to your membership or usage of the Club and our facilities (for example, your tennis/squash ranking, when making court bookings, or when making use of other Club facilities);
- Your photographic and/or video image.

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:

Administration of your Club membership, including:

- Informing you about playing court/facilities availability and opening hours;
- Taking payment of subscription, playing court booking, tournament entry and other membership and participatory fees;
- Storing your details on the software platforms we use for our online club member management systems and court booking systems;
- Fulfilment of orders for goods and services, including playing court bookings;
- Where this is necessary for the performance of a contract (including any written terms and conditions relating to your membership, such as our Club Constitution) with you;
- Research and statistical analysis about who is playing tennis or squash in our Club or is otherwise using our facilities;
- Informing us of your preferences and dislikes for purposes of assessing the needs and requirements of DSC;
- Communication about our Club activities that we think may be of interest to you;
- Where this is necessary for our legitimate interests (for example, in increasing the use of DSC's facilities, in surveys and participation in the sports of tennis and squash generally);
- Promoting our Club;
- Promoting goods and services of third parties which are closely related to your membership of the Club (for example, operators of coaching lessons and courses, organisers of tennis and squash events, and of suppliers of tennis and squash equipment) where we think this will be of interest to you as a member;
- Wherever this is necessary for our legitimate interests (or the legitimate interests of a third party), by regulation or statutory obligation, and/or where we have your consent, as applicable.

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 to you regardless of your marketing preferences in order for us to fulfil our contractual obligations to you as a member or user of our Club. Examples of these essential service communications are:

- Confirmation of transactions, such as payment receipts;
- Membership related mailings such as your membership renewal invoice and any reminders, notices of formal meetings, and information about Club events and activities;
- General Club newsletters and general newsletters relevant to your section of membership or usage of our facilities. You may however opt-out at any time from being sent such general newsletters.

Control of your data

You are in control of how we communicate with you. The personal information in our membership system used by DSC is available for you to view and amend yourself in your member profile. This is accessed using the website username (or email address) and password that was issued to you by DSC at the time of joining. You can also change your password at any time.

Alternatively, you may request amendments and deletions to our membership system, and also to our other systems which may contain your personal information, or obtain a copy of your data from the Administrator:

Telephone	Email	Post
01904 481039	nick@dunningtonsportsclub.co.uk	Common Road, Dunnington, YO19 5NG

Sharing your information with others

We do not sell your personal data. We do not share your personal data with other organisations or persons 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:

- Club volunteers and Company employees, for the purposes of administering your membership and giving you access to the membership benefits to which you are entitled;
- Our systems providers who host our membership, bookings management, website, email, and online security backup and recovery services;
- Our debit/credit card payment gateway systems supplier through whom we collect some membership subscriptions, court and tournament fees, and other revenues. We do not retain any of your personal debit/credit card financial data as this is processed entirely within the systems of our gateway supplier;
- Our contractors and suppliers, including providers of outsourced coaching services;
- Other Club members generally where we make accessible your name, email and telephone number via the members secured website in order to facilitate the general arranging of sporting or social activities involving you as a member which are core to your membership of the Club. Access to this personal information is not accessible by the general public. We make such personal data accessible generally to other Club members through the members secured website only if you have specifically opted-in for the service and you may opt-out at any time by changing this setting in your membership profile in the members secured website system;
- Other Club members generally where we make accessible your name via our secured Court Booking Directory systems in order to facilitate the online booking of and payment for playing courts involving you as a member which is core to your membership of the Club. Access to this data item is not accessible by the general public. We make such personal data accessible generally to other Club members through the Court Booking Directory system for all Full and Off Peak Squash members. You may opt-out from this at any time but doing so would prevent you from booking tennis and squash playing courts online. Youth and other non-Full Club members may opt-in at any time;
- Selected other Club members where we may provide your name, email and telephone number in order to facilitate your participation in box league and intra-club playing events where you choose to enter such events. Access to these data items is not accessible by the general public. We make this personal data

accessible to other Club members who participate in such events through email and/or emailed shared Excel spreadsheets. It is a condition of your entry into such events that you agree to this limited use by us of your personal data;

- Selected other Club members and selected members of the public where we may provide your name, email and telephone number in order to facilitate your participation with other clubs and organisations where you choose to represent the Club in a sporting match. These data items are made available via email and/or telephone between the relevant Club volunteers or employees who organise such matches and those members of the public who may represent the particular competing club, tournament or organisation at the time. It is a condition of your participation in such matches that we may make such personal data accessible in this way where you have chosen to represent the Club in a sporting team;
- England Squash in order to provide you with benefits associated with your Club membership;
- Other Club members and the general public where your photographic image may appear on our Club website or on one or more of our social media websites in photographs of sports play or social activities in and associated with the Club. You may ask at any time for your image to be removed from these websites should you so wish.
- Other Club members and the general public where your name may appear on one or more of our social media websites in postings related to sports play or social activities in and associated with the Club. You may ask at any time for your name to be removed from these websites should you so wish;
- Other Club members and the general public where your video image may appear in our website video feed which we make available to members to facilitate their assessment of playing/weather conditions on our tennis courts and generally to share in the enjoyment of the Club and its facilities. We do not record or store such video images;
- Other Club members and the general public where your name may appear in our premises or on our website in connection with a sporting or Club event, for example on our honours board, tournament scoreboards, or notices of participants;
- Law enforcement authorities when at their legitimate request we may make our CCTV security camera system video data available to the police. Our CCTV system otherwise routinely deletes such generally collected video images within a short period by overwriting them;
- Certain statutory bodies, including the police and designated local authority personnel in the rare event that our over-riding responsibilities under our duty of care to others or under the Club Safeguarding Policy with which we comply so require.

How long your personal information is kept

You may withdraw from membership of any of the sports Club you are a member of by giving notice in writing by contacting the relevant membership secretary. You are also deemed under the Constitution to have resigned your membership if, more than thirty days after your subscription renewal date, your renewal invoice remains unpaid. In certain other rare circumstances as defined in our Constitution your membership may be terminated by the Club.

A maximum of two calendar months after you have ceased to be a member we will clear your personal details from our membership, Court Bookings Systems and subscriptions databases so that there is no data held that could identify you as a person.

We retain your paid subscription data in order to retain the integrity of our financial accounting records and for other statutory and regulatory purposes for a period of six years after the year in which your membership of the Club has ceased. After this time or after the expiration of any longer statutorily required retention period all such remaining data will be deleted.

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.

The above rights are not absolute, and we may be entitled to refuse requests where certain 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 the Administrator:

Telephone	Email	Post
01904 481039	info@dunningtonsportsclub.co.uk	Common Road, Dunnington, YO19 5NG

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.

Chair of Dunnington Squash and Racketball Club

Specific use of CCTV within Dunnington Squash and Racketball Club

Dunnington Squash and Racketball Club (DSC) is fully committed to the safety of its Members and Visitors and to this extent has invested in the security of its facilities. The purpose of this Policy is to regulate the management, operation and use of the closed-circuit television (CCTV) system within and outside the premises.

Common CCTV systems are based around digital technology and therefore need to be treated as information that will be processed under the Data Protection Act 1998. Each section of the sports club operating CCTV will have the overall responsibility for its use and maintenance. The system comprises a number of dome cameras located both internally and externally around the Club. All cameras may be monitored and are only available for use by approved members of staff.

The CCTV system is owned by the Club or sports section and will be subject to review on an annual basis.

Objectives of the CCTV System

The objectives of the CCTV system are: –

- To protect the Club buildings, facilities and its assets to ensure they are kept free from intrusion, vandalism, damage or disruption.
- To increase the personal safety of Staff, Members and visitors and reduce the fear of physical abuse, intimidation and crime.
- To support the police in a bid to deter and detect crime.
- To assist in identifying, apprehending and prosecuting offenders on the Club.
- To protect members of the public and private property.
- To assist in the usage and management of the Club building on a day to day basis.

Statement of Intent

The Club will comply with the Data Protection Act 1998, whether it be information, recordings and downloads which relate to the CCTV system.

Cameras will be used to monitor activities within the Club buildings, the car parks and other areas to identify criminal activity actually occurring, anticipated, or perceived, and for the purpose of securing the safety and wellbeing of the occupants within the Club, together with its visitors.

Staff have been instructed to ensure that static cameras will not focus on private homes, gardens and other areas of private property.

Materials or knowledge secured as a result of the CCTV system will not be used for any commercial purpose. Downloads will only be released to the media for use in the investigation of a specific crime and with the written authority of the police. Downloads will never be released to the media for purposes of entertainment. Full clarification can be obtained from the relevant Club Secretary.

The planning and design of the existing CCTV system has endeavoured to ensure that the CCTV system will give maximum effectiveness and efficiency, but it is not possible to guarantee that the CCTV system will cover or detect every single incident taking place in the areas of coverage.

Warning signs, as required by the Code of Practice of the Information Commissioner have been placed at all access routes to areas covered by the Club CCTV.

Operation of the System

The system will be administered and managed by the Club, in accordance with the principles and objectives expressed in this Policy.

The day-to-day management will be the responsibility of the relevant sports section using CCTV.

The CCTV system will be operated 24 hours each day, every day of the year.

CCTV System

The Club Manager will check and confirm the efficiency of the system daily and in particular that the equipment is properly recording and that cameras are functional.

Access to the CCTV will be strictly limited to the members of staff approved by the relevant Club Secretary.

Unless an immediate response to events is required, staff must not direct cameras at an individual or a specific group of individuals.

The CCTV system may generate a certain amount of concern from members of the public. Any concern expressed by a member of the public should be referred to the Club Secretary. If permission is granted by the Club Secretary, the member of the public must be accompanied throughout the visit by a member of staff.

Any site visit by a member of the public may be immediately curtailed if the operational requirements of the CCTV System make this a necessity.

Other administrative functions will include maintaining hard disc space, filing and maintaining occurrence and system maintenance logs by the relevant sports section in the Club.

In the event of an emergency, which requires an immediate contact with an emergency service, that emergency service will be contacted by a member of staff.

Liaison

Liaison meetings may be held with all bodies involved in the support of the CCTV system i.e. maintenance contractors, approved staff, police etc.

Monitoring Procedures

Camera surveillance may be maintained at times for monitoring purposes.

Video Download Procedures

Recordings may be viewed by the police and authorized officers from Yorkshire Police for the prevention and detection of crime. Permission to do this will be given by the Club Secretary.

A record will be maintained of the release of downloads to the police or other authorized applicants. A register will be available for this purpose and will be kept by the Club Manager.

Viewing of downloads by the police must be recorded in writing and in the register. Requests by the police can only be actioned under section 29 of the Data Protection Act 1998.

Should a download be required as evidence, a copy may be released to the police under the procedures described in the above paragraphs of this Policy. Downloads will only be released to the police on the clear understanding that the disc remains the property of the Club, and both the disc and information contained on it are to be treated in accordance with this Policy. The Club also retains the right to refuse permission for the police to pass to any other person the disc or any part of the information contained thereon.

Applications received from outside bodies (e.g. solicitors) to view or release downloads will be referred to the Club Secretary. In these circumstances' downloads will normally be released where satisfactory documentary evidence is produced showing that they are required for legal proceedings, a subject access request, or in response to a Court Order. A fee of £10,000 can be charged in such circumstances. The club solicitors will be consulted on all requests .

Breaches of the Policy (including breaches of security)

Any breach of this Policy by Club staff will be initially investigated by the Club Secretary, for him/her to take the appropriate disciplinary action.

Any serious breach of the Policy will be immediately investigated, and an independent investigation carried out to make recommendations on how to remedy the breach.

Assessment of the Scheme and CCTV Usage Policy

Performance monitoring, including random operating checks, may be carried out by the approved persons.

Complaints

Any complaints about the Club's CCTV system should be addressed to the Club Secretary.

Complaints will be investigated in accordance with Section 9 of this Policy.

Access by the Data Subject

The Data Protection Act provides Data Subjects (individuals to whom "personal data" relate) with a right to data held about themselves, including those obtained by CCTV.

Requests for Data Subject Access should be made in writing to the Club Secretary.

Public Information

Copies of this Policy will be available to the public, by making a request to the Club Secretary.

A copy of this Policy will be located in the Club Office for information purposes to members of staff.

System Maintenance and Monitoring

The system will be maintained in accordance with the Data Protection Act 1998.

The system will only be maintained and monitored by companies which carry the relevant accreditation from the Security Systems and Alarm Inspection Body (SSAIB) or National Security Inspection (NSI).

It will be the responsibility of the relevant sports section to liaise with the maintaining company for the reporting of faults on the system, any changes to the site which may affect the operation of the system.

It will be the responsibility of the Club Manager to arrange regular system reviews with the maintaining company.

Summary of Key Points

- This CCTV Usage Policy will be reviewed on an annual basis.
- The CCTV system is owned and operated by the Club.
- The CCTV system cannot be accessed by visitors/members of the public except by prior arrangement with the relevant Club Secretary and with good reason.
- Liaison meetings may be held with the police and other bodies.
- Copies of downloads may only be viewed by authorized staff and the police with the express permission of the Clubs Secretary.

- Copies required as evidence will be properly recorded witnessed and packaged before copies are released to the police.
- Copies will not be made available to the media for commercial or entertainment reasons.
- Any Covert Surveillance or use of a Covert Human Intelligence Source being considered or planned as part of an operation must comply with the CCTV Usage Policy.
- Any breaches of this Policy will be investigated by the Club Secretary: an independent investigation will be carried out for serious breaches.
- Breaches of the Policy and recommendations will be reported to the Club Secretary.
- The system will be maintained on a regular basis by an approved contractor.