



PRIVACY NOTICE

June 2018

for members, visitors, friends and volunteers

This notice explains how Waverley (the club) complies with the General Data Protection Regulation (GDPR), effective from 25 May 2018, as a “controller” of personal data under that Regulation. It sets out:

- what information is collected from you by the club
- how it may be used
- when it may need to be shared
- how long it will be kept
- your rights and how to exercise them

What we need from you

Members

When you register as a member of Waverley or renew your membership (including if you are registering or renewing on behalf of a young person aged 18 or under), we will ask you for some or all of the following personal information:

- Contact details – eg. name, address, email address and phone number.
- Date of birth – to calculate membership category and eligibility for events, teams and courses.
- Sometimes we will need bank account details in order to refund overpayments.

Our ability to offer you our full membership services and benefits will depend on the information that you give to us.

Visitors

- i. If you have been the guest of a member to play one of our sports, your name and the date of your visit will be recorded for monitoring purposes.
- ii. If you are a guest of a member having a drink in the bar you will be asked to enter your name and address in the Visitors Book. This is a requirement of the Liquor Licence.

Friends

If you have attended a social function at Waverley and have agreed to be added to the dedicated Friends of Waverley email list, the club will record your name and email address.

Volunteers

If you are a **member or non-member** who has volunteered to help working with juniors at the club we may need to collect personal information relating to criminal convictions or alleged commission of criminal offences where you are required to complete a PVG check under the Protection of Vulnerable Groups (Scotland) Act 2007. This information will include your PVG certificate number, PVG membership number, date of issue and any relevant information in relation to your membership of the PVG Scheme.

If your PVG certificate is not clear, we will have a legitimate interest to collect references and any other applicable information to allow us to consider whether or not you can volunteer in a regulated role with children and/or vulnerable adults.

Why we need your personal information – contractual purposes

Members

We need to collect our members' personal information so that we can manage your relationship with us. We may use your personal information to:

- Provide you with core member services, including confirmation of membership, communications about end of year renewals and club meetings such as the AGM and information such as changes to opening or closing times.
- Provide you with access to the club, its facilities and to the online court booking system.
- Advise the sports' governing bodies, Scottish Squash and the Lawn Tennis Association (LTA), of names of members competing in, and/or captaining teams in, inter-club competitions.

Why we need your personal information – legitimate purpose

Members

We also process our members' personal information in pursuit of our legitimate interests to:

- Provide you with news and updates about the sporting and social activities of the club.
- Raise awareness of the club's activities by capturing photos and videos. We will use this for promotion, education and development purposes.
- Respond to and investigate your questions, comments, support needs, complaints, concerns or allegations.
- Provide appropriate coaching and skill training opportunities for the development of our members, e.g CPR and sport.

Visitors

We need to monitor the use of our sports facilities by guests and to ensure that the appropriate fees are being paid.

Why we need your personal information – legal obligations

We are under a legal obligation to process certain personal information relating to our **member and non-member volunteers and our visitors to the bar** for the purposes of complying with obligations under:

- The Protection of Vulnerable Groups (Scotland) Act 2007, which requires us to check that our coaches and volunteers are able to undertake regulated work with children and vulnerable adults.
- Liquor Licensing law in respect of visitors drinking at the bar.

Other uses of your personal data

- i. We may ask you if we can process your personal information for other purposes. Where we do so, we will provide you with an additional privacy notice explaining how we will use your information for these purposes.
- ii. In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

Who we share your personal information with

- Some information may be shared with the Head Coach of the Waverley Tennis Academy to verify membership and to publicise coaching activities.
- When we notify Scottish Squash or the LTA of your participation in inter-club matches organised by them, we pass on some of your personal data and those organisations become a controller of your personal data. Scottish Squash and the LTA provide full details of how they use your personal data in their own privacy notices and will not use it for any other purpose.

<https://www.scottishsquash.org/policies-procedures>

<https://www.lta.org.uk/about-the-lta/policies-and-rules/privacy-policy/>

- We may be required to share personal information with statutory or regulatory authorities to comply with statutory obligations. Such organisations include the Health & Safety Executive, Disclosure Scotland, and Police Scotland for the purposes of safeguarding children. We may also share personal information with professional and legal advisors for the purpose of obtaining advice.

Third party suppliers with access to members' personal data

Waverley uses third party suppliers to provide services and who may therefore process personal data on our behalf as "processors" and are subject to contractual conditions to only process that personal information under our instructions and to protect it. We only share such information strictly required for the specific purposes and take reasonable steps to ensure recipients shall only process the disclosed personal information in accordance with those purposes:

- ClubNet to provide our online court booking system and a platform for members to share their contact details privately.
- Mailchimp for the distribution of some of our email communications. Their servers are based in the US and they uphold the EU Privacy Shield to certify their data security.
- SportyHQ for the organisation of internal club competitions such as tournaments and leagues. Their servers are based in the US and they uphold the EU Privacy Shield to certify their data security.

How we protect your personal information

Your personal information may be accessed by Waverley Committee Members, Welfare Officer, Team Captains and other volunteers, including event organisers, only as necessary for the purposes set out above. It is stored by these club volunteers electronically in encrypted files, or in the case of paper records, in locked cupboards.

How long we keep your personal information

We only keep your personal information for as long as necessary to provide you with membership and other services. Unless you ask us not to, we will review and delete your personal information as follows.

Members: after 6 years of lapsed membership.

Visitors: after one year.

Friends: when instructed by the friend to do so.

Members and non-members volunteering with juniors: information received from the PVG scheme is held in confidence by the club's Welfare Officer and will be retained while the person is still active at the club.

You have a right to:

- Change your communication preferences or restrict the processing of your personal data for specific purposes.
- Request that we correct your personal data if you believe it is inaccurate or incomplete.
- Request that we delete your personal information.
- Access the personal data that we hold about you through a "subject access request".

If you are dissatisfied, you have a right to raise a complaint with the Information Commissioner's Office at www.ico.org.uk

You can contact us at waverley@waverleysports.co.uk