



TUNBRIDGE WELLS HOCKEY CLUB PRIVACY NOTICE AND POLICY FOR OUR MEMBERS



We are committed to protecting and respecting your privacy. This notice is to explain how we may use personal information we collect before, during and after your membership (or any period where you are party to a contract for services) with us. This notice applies to you if you have registered to become or are a member of our Club, are a volunteer for the Club or if you provide services to the Club under a contract for services. This notice explains how we comply with the law on data protection, what your rights are and for the purposes of data protection we will be the controller of any of your personal information.

References to **we**, **our** or **us** or to the **Club** in this privacy notice are to Tunbridge Wells Hockey Club.

We have not appointed a Data Protection Officer to oversee our compliance with data protection laws as we are not required to do so, but our Membership Secretary has overall responsibility for data protection compliance in our organisation. Contact details are set out in the "Contacting us" section at the end of this privacy notice.

1. PERSONAL INFORMATION WE MAY COLLECT FROM YOU

Depending on the type of membership you register for with us, you may initially provide us with or we may obtain **personal information** about you, such as information regarding your:

- personal contact details that allows us to contact you directly such as name, title, email addresses and telephone numbers;
- date of birth;
- gender;
- membership start and end date;
- references and other information included in a CV or cover letter or as part of the application process for membership or for a role within the Club;
- records of your interactions with us such as telephone conversations, emails and other correspondence and your instructions to us;
- any credit/debit card and other payment details you provide so that we can receive payments from you and details of the financial transactions with you;
- records of your attendance at any events hosted by us;
- images in video and/or photographic form and voice recordings;
- your marketing preferences so that we know whether and how we should contact you.
- copies of identification documents such as passport and identity cards;
- details of any hockey related association or county membership;
- details of next of kin, family members, coaches and emergency contacts;
- records and assessment of any player rankings, grading or ratings, competition results, details regarding events, training, matches and courses attended and performance (including that generated through player pathway programme); and
- any disciplinary and grievance information.

2. SPECIAL CATEGORIES OF PERSONAL INFORMATION

We may also collect, store and use the following "**special categories**" of more sensitive personal information regarding you:

- information about your race or ethnicity; and
- information about your health, including any medical condition or disability, medication needs and health professional information.

We may not collect all of the above types of special category personal information about you. In relation to the special category personal data that we do process we do so on the basis that

- it is necessary to ensure the safe running of or participation of Club members in training or matches in which the Club is involved;
- the processing is necessary for reasons of substantial public interest, on a lawful basis;
- it is necessary for the establishment, exercise or defence of legal claims;
- it is necessary for the purposes of carrying out the obligations and exercising our or your rights in the field of employment and social security and social protection law; or
- based on your explicit consent.

We may also collect criminal records information about you. For criminal records history we process it on the basis of legal obligations or based on your explicit consent.

3. **WHERE WE COLLECT YOUR INFORMATION**

We typically collect personal information about our members when you apply to become a member of the Club, you submit a membership renewal form, if you participate for the Club as a guest in any tournament in which the Club participates and when you purchase any services or products we offer (such as kit, courses or events), when you make a query and/or complaint or when you correspond with us by phone, e-mail or in some other way.

We also may collect personal information about you from any third party references you provide as part of the application process for membership or a role within the Club.

If you are providing us with details of referees, next of kin, beneficiaries, family members and emergency contacts they have a right to know and to be aware of what personal information we hold about them, how we collect it and how we use and may share that information. Please share this privacy notice with those of them whom you feel are sufficiently mature to understand it. They also have the same rights as set out in the “**Your rights in relation to personal information**” section below.

We also collect personal information via our availability app (used to manage availability and selection for matches) – presently we primarily use Teamstuff.

If you sign up for Teamstuff (or any other similar app used by the Club) you will share personal information with them, who hold such information subject to their own privacy rules – for Teamstuff details can be found at <https://teamstuff.com/privacy.html>. To the extent that we obtain your personal information from Teamstuff, (or any other app provider used by the Club) we will hold it and use it as set out in this Privacy Notice.

4. **USES MADE OF THE INFORMATION**

The reason we need your personal information is to be able to administer your membership, and provide the membership services you are signing up to when you register with the Club and/or as part of a paid or voluntary role you may take on with the Club. Our lawful basis for processing your personal is that we have obligations to you as a member or volunteer/service provider, whether to provide the services we offer to members or perform our contractual obligations where you enter into a contract for services with us.

Reasons we need to process your data include:

For training and competition entry

- sharing personal data with Club coaches or officials to administer training sessions;
- sharing personal data with Club team managers to participate in matches and competitions and/where applicable for the purposes of travel arrangements;
- sharing personal data with facility providers to manage access, satisfy their health and safety requirements or check delivery standards; and
- sharing personal data with leagues, national or county associations (and county schools' associations) and other competition providers for entry in competitions and/or participation in national governing body development programs.

For funding and reporting purposes

- sharing anonymised data with a funding partner as condition of grant funding e.g. local and community funding opportunities;
- analysing anonymised data to monitor Club trends; and
- sending surveys to improve your experience as a Club member.

For membership and club management

- processing of membership forms and payments;
- sharing data with committee members to provide information about Club activities, membership renewals or invitation to social events;
- Club newsletter promoting Club activity; and
- publishing of match and competition results.

Marketing and communications (where separate consent is provided)

- sending information about selling club kit, merchandise or fundraising.

Any special category health data we hold on you is only processed for the purposes of passing health data to coaches to allow the safe running of training sessions. Similarly, we utilise England Hockey's DBS checking service for criminal record checks for persons where such checks are required by reason of the role or position you may hold with the Club and England Hockey will provide the Club with the results of such checks in respect of the role for which you are to be appointed (not the underlying data which you may be required to provide for the purposes of such checks). We process this data on the lawful basis of consent. Therefore, we will also need your explicit consent to process this data, which we will ask for at the point of collecting it.

Where you have given us your consent to use your personal information in a particular manner, you have the right to withdraw this consent at any time, which you may do by contacting us as described in the "Contacting us" section below.

Please note however that the withdrawal of your consent will not affect any use of the data made before you withdrew your consent and we may still be entitled to hold and process the relevant personal information to the extent that we are entitled to do so on bases other than your consent. Withdrawing consent may also have the same effects as not providing the information in the first place, for example we may no longer be able to provide certain member benefits to you or you may not be able to continue to act in a particular role for the Club.

The Club has the following social media pages - Facebook, Twitter, Instagram. All members are free to join these pages. If you join one of the Social Media pages, please note that providers of the social media platforms have their own privacy policies and that the Club does not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data on the Club social media pages.

5. DIRECT MARKETING

Email, post and SMS marketing: from time to time, we may contact you by email with information about products and services we believe you may be interested in. These will only be hockey related (kit and courses) or to provide information about offers available to members from our sponsors.

We do not share your information with our sponsors or, other than as set out in section 6 below, other third parties.

If you unsubscribe from the weekly newsletter (referred to as the Chairman's Message) you will not receive any marketing from the Club (but you will also not receive any general news and information about Club activities and events).

6. DISCLOSURE OF YOUR PERSONAL INFORMATION

We share personal information with the following parties:

- **Any party approved by you.**
- **To any governing bodies or regional bodies for the sports covered by our Club:** to allow them to properly administer the sports on a local, regional and national level.
- **Other service providers:** for example Mailchimp (used by the Club to send out newsletters and information on Club events and activities) and SurveyMonkey (for the purposes of distributing any Club specific surveys);
- **Our supply chain partners** and sub-contractors, such as couriers, import/export agents, shippers,
- **The Government or our regulators:** where we are required to do so by law or to assist with their investigations or initiatives.
- **Police, law enforcement and security services:** to assist with the investigation and prevention of crime and the protection of national security.

7. HOW LONG DO WE KEEP PERSONAL INFORMATION FOR?

The duration for which we retain your personal information will differ depending on the type of information and the reason why we collected it from you. However, in some cases personal information may be retained on a long-term basis: for example, personal information that we need to retain for legal purposes will normally be retained in accordance with usual commercial practice and regulatory requirements. Generally, where there is no legal requirement we may retain all physical and electronic records for a period of up to 7 years after your last contact with us or the end of your membership/any contract for services.

It is important to ensure that the personal information we hold about you is accurate and up-to-date, and you should let us know if anything changes, for example if you change your phone number or email address. You can contact us by using the details set out in the "**Contacting us**" section below.

8. YOUR RIGHTS IN RELATION TO PERSONAL INFORMATION

You have the following rights in relation to your personal information:

- the right to be informed about how your personal information is being used;
- the right to access the personal information we hold about you;
- the right to request the correction of inaccurate personal information we hold about you;
- the right to request the erasure of your personal information in certain limited circumstances;
- the right to restrict processing of your personal information where certain requirements are met;
- the right to object to the processing of your personal information;
- the right to request that we transfer elements of your data either to you or another service provider; and
- the right to object to certain automated decision-making processes using your personal information.

You should note that some of these rights, for example the right to require us to transfer your data to another service provider or the right to object to automated decision making, may not apply as they have specific requirements and exemptions which apply to them and they may not apply to personal information recorded and stored by us. For example, we do not use automated decision making in relation to your personal data. However, some have no conditions attached, so your right to withdraw consent or object to processing for direct marketing are absolute rights.

Whilst this privacy notice sets out a general summary of your legal rights in respect of personal information, this is a very complex area of law. More information about your legal rights can be found on the Information Commissioner's website at <https://ico.org.uk/for-the-public/>.

To exercise any of the above rights, or if you have any questions relating to your rights, please contact us by using the details set out in the "Contacting us" section below.

If you are unhappy with the way we are using your personal information you can also complain to the UK Information Commissioner's Office or your local data protection regulator. We are here to help and encourage you to contact us to resolve your complaint first.

9. CHANGES TO THIS NOTICE

We may update this privacy notice from time to time. When we change this notice in a material way, we will update the version date at the bottom of this page. For significant changes to this notice we will try to give you reasonable notice unless we are prevented from doing so. Where required by law we will seek your consent to changes in the way we use your personal information.

10. CONTACTING US

In the event of any query or complaint in connection with the information we hold about you, please email alecpelmore@btinternet.com or write to us at Alec Pelmore, Membership Secretary, The Old Farmhouse, Hartlake Road, Golden Green, Tonbridge, Kent, TN11 0BL.

Version dated 7 August 2018