



## DATA PROTECTION AND PRIVACY POLICY

### 1. About this Policy

- 1.1 This policy explains when and why we collect personal information about our members and coaches, how we use it and how we keep it secure and your rights in relation to it.
- 1.2 We may collect, use and store your personal data, as described in this Data Privacy Policy and as described when we collect data from you.
- 1.3 We reserve the right to amend this Data Privacy Policy from time to time without prior notice. You are advised to check our website [www.sandycovetsc.ie](http://www.sandycovetsc.ie).
- 1.4 We will always comply with the General Data Protection Regulation (**GDPR**) when dealing with your personal data. Further details on the GDPR can be found at the website for the Data Protection Commissioner ([www.dataprotection.ie](http://www.dataprotection.ie)). For the purposes of the GDPR, we will be the “controller” of all personal data we hold about you.

### 2. Who are we?

- 2.1 We are Sandy Cove Tennis and Squash Club. We can be contacted at

Elton Park,  
Sandy Cove,  
Co Dublin  
A96 HX97

(01) 2809645  
[sandycovetsc@eircom.net](mailto:sandycovetsc@eircom.net)

### 3. What information we collect and why.

Type of information	Purposes	Legal basis of processing
Member's name, address, telephone numbers, e-mail address(es).	Managing the Member's membership of the Club.	Performing the Club's contract with the Member. For the purposes of our legitimate interests in operating the Club.
The names and ages of the Member's dependants	Managing the Member's and their dependants' membership of the Club	Performing the Club's contract with the Member.
Date of birth / age related information	Managing membership categories which are age related	Performing the Club's contract with the Member.
Gender	Provision of adequate facilities for members. Reporting information to	For the purposes of our legitimate interests in making sure that we can provide sufficient and suitable

	Tennis Ireland and Irish Squash.	facilities (including changing rooms and toilets) for each gender. For the purposes of the legitimate interests of Tennis Ireland and Irish Squash to maintain diversity
Photos and videos of Members	Placing on the Club's website and social media pages.	Consent. We will seek the Member's consent on their membership application form. The Member may withdraw their consent at any time by contacting us by e-mail or letter.
The Member's name, phone number and e-mail address	Creating and managing the Club's online Membership Directory.	Consent. We will seek the Member's consent on their membership application form. The Member may withdraw their consent at any time by contacting us by e-mail or letter or through the <i>clubmanager</i> system to tell us that they no longer wish their details to appear in the Membership Directory.
Name, e-mail address and telephone number of each Club committee member	Information published on Club's website	For the purposes of our legitimate interests in operating and promoting the Club
Employees and representatives of suppliers to the Club	Entering into and managing arrangements with suppliers	Entering into and performing contracts with suppliers
Coaches name, address, email addresses, phone numbers and relevant qualifications and/or experience	Managing instruction at the Club.	For the purposes of our legitimate interests in ensuring that we can contact those offering instruction and provide details of coaches to members.
Name, and (parent) telephone number and any health issues of children attending school break camps on consent forms	Managing the school break camps. The information is deleted on completion of the camps.	For the purposes of our legitimate interests in operating the events
Name, address, mobile number, or email address for the Easy payments Plus system.	To facilitate payments from you.	For the purposes of our legitimate interests in operating the Club

Note: Tennis Ireland shall also include affiliate regional organisations Leinster Tennis and DLTC.

#### 4. How we protect your personal data

4.1 We will not transfer your personal data outside the EU without your consent.

- 4.2 We have implemented generally accepted standards of technology and operational security in order to protect personal data from loss, misuse, or unauthorised alteration or destruction.
- 4.3 Please note however that where you are transmitting information to us over the internet this can never be guaranteed to be 100% secure.
- 4.4 For any payments which we take from you online we will use a recognised online secure payment system.
- 4.5 We will notify you promptly in the event of any breach of your personal data which might expose you to serious risk.

## **5. Who else has access to the information you provide us?**

- 5.1 We will never sell your personal data. We will not share your personal data with any third parties without your prior consent (which you are free to withhold) except where we are required to do so by law or as set out in the table above or in paragraphs 5.2 and 5.3 below.
- 5.2 We may pass your personal data to third parties who are service providers, agents and subcontractors to us for the purposes of completing tasks and providing services to you on our behalf (e.g. to print newsletters and send you mailings). We do this for the purpose of our legitimate interests in operating the Club and for performing our contract with you. However, we disclose only the personal data that is necessary for the third party to deliver the service and we have a contract in place that requires them to keep your information secure and not to use it for their own purposes. It is possible that third parties may themselves engage others (sub-processors) to process your data. Where this is the case third parties will be required to have contractual arrangements with their sub-processor(s) that ensure your information is kept secure and not used for their own purposes.
- 5.3 We may also pass your personal data to the Tennis Ireland/Irish Squash for the purposes of carrying out surveys when it is in the legitimate interest of the club and the Tennis Ireland/Irish Squash to do so. The Tennis Ireland/Irish Squash may use third parties to carry out the surveys but disclose only the personal data that is necessary for the third party to do so and will have a contract in place that require the third party to keep your information secure and not to use it for their own purposes.

## **6. How long do we keep your information?**

- 6.1 We will hold your personal data on our systems for as long as you are a member of the Club and for as long afterwards as it is in the Clubs' legitimate interest to do so or for as long as is necessary to comply with our legal obligations. We will review your personal data every year to establish whether we are still entitled to process it. If we decide that we are not entitled to do so, we will stop processing your personal data except that we will retain your personal data in an archived form in order to be able to comply with future legal obligations e.g. compliance with tax requirements and exemptions, and the establishment, exercise or defence of legal claims.
- 6.2 We securely destroy all financial information once we have used it and no longer need it.

## **7. CCTV**

- 7.1 The Club employs CCTV for the security of its premises and property. This is intended to capture images of intruders or of individuals damaging property or removing property without authorisation. Images are in general not stored beyond a period of 31 days, save where the images may identify an issue – such as a break-in or theft – and are retained specifically in the context of an

investigation of that issue. Access to CCTV footage is strictly restricted to authorised personnel only.

## **8. Website**

- 8.1 The Club runs a website ([www.sandycovetsc.ie](http://www.sandycovetsc.ie)), which contains a password protected Members Only section. Each Member is provided with a username and password to access this section. Access allows Members to book tennis courts, but otherwise Members only have reading access to the contents of the site.

### *Collection and use of personal information*

- 8.2 We do not collect any personal data about you on our site, apart from information which you volunteer (for example by e-mailing us or by using our feedback facility). Any information which you provide in this way is not made available to any third parties. It is treated with the highest standard of security and confidentiality, strictly in accordance with the Data Protection Acts, 1988 and GDPR regulations, used by us for the purpose you provided it. If you wish to discuss any matter relating to the processing of personal information on our site, please email: [webmaster@sandycovetsc.ie](mailto:webmaster@sandycovetsc.ie).

### *Collection and use of technical information*

- 8.3 Technical details in connection with visits to our site are logged by our internet service provider for our statistical purposes. No information is collected that could be used by us to identify website visitors.
- 8.4 The technical details logged are confined to the following terms:
- the IP address of the visitor's web server
  - the top-level domain name used (for example .ie, .com, .org, .net)
  - the previous website address from which the visitor reached us, including any search terms used
  - clickstream data which shows the traffic of visitors around this web site (for example pages accessed and documents downloaded)
  - the type of browser used by the website visitor.
- 8.5 We make no attempt to identify individual visitors, or to associate the technical details listed above with any individual. It is our policy never to disclose such technical information in respect of individual website visitors to any third party (apart from our internet service provider, which records such data on our behalf and which is bound by confidentiality provisions in this regard), unless obliged to disclose such information by a rule of law. The technical information is only used by us, and we use it only for statistical and other administrative purposes such as assessing the number of visitors to the different sections of our site and identifying the nature of the information most and least used.

## **9. Online Payments**

- 9.1 We use a proprietary system called Easy Payments Plus on our website to collect members subscriptions and junior coaching fees. All payments are processed using Secure Socket Layer Technology which ensures the security of the transaction.
- 9.2 The Club is a PCI (Payment Card Industry) compliant payment processor, which ensures that, for all Credit Card transactions, all card holder data is managed securely.

## 10. Club Staff

- 10.1 The Club is also an employer. All data held in respect of its staff is strictly restricted to authorised personnel only.

## 11. Your rights

- 11.1 You have rights under the GDPR:
- (a) to access your personal data
  - (b) to be provided with information about how your personal data is processed
  - (c) to have your personal data corrected
  - (d) to have your personal data erased in certain circumstances
  - (e) to object to or restrict how your personal data is processed
  - (f) to have your personal data transferred to yourself or to another business in certain circumstances.

You have the right to take any complaints about how we process your personal data to the Data Protection Commissioner:

Data Protection Commissioner  
Canal House  
Station Road  
Portarlinton  
R32 AP23 Co. Laois

- (t) +353 57 8684800
- (e) [info@dataprotection.ie](mailto:info@dataprotection.ie)
- (w) [www.dataprotection.ie](http://www.dataprotection.ie)

For more details, please address any questions, comments and requests regarding our data processing practices to our Data Protection Champion who is the Honorary Secretary, ([sandycovetsc.hon.secretary@gmail.com](mailto:sandycovetsc.hon.secretary@gmail.com)).