St George's Hill Lawn Tennis Club Privacy Notice

1. Introduction

St. George's Hill Lawn Tennis Club Limited, of St. Georges Hill, Weybridge, Surrey KT13 0LL, incorporated in England and Wales with company number 01026986, is committed to protecting and respecting members and its staff privacy and complying with applicable data protection and privacy laws. This privacy notice sets out the basis on which the Club will process any personal data collected from individuals using this website, or that individuals provide to the Club. Please read the following carefully to understand the Club's Policy and practices regarding your personal data and how it will be treated.

2. Data Controller

St. George's Hill Lawn Tennis Club Limited ("the Club") is the data controller and is responsible for individuals' personal data.

The Club's nominated data protection representative is Miles Hill, who is responsible for overseeing questions in relation to this privacy notice. If members and staff have any questions about this notice, including any requests to exercise their legal rights, please contact the data protection representative using the contact details provided at the end of this notice.

3. What individual's data is processed?

Personal data, or personal information, means any information about an individual from which a person can be identified. It does not include data where the identity has been removed (anonymous data).

The Club may collect and process the following data about individuals:

- Contact details such as name, address, e-mail address and phone number.
- Financial details including financial and credit card information,
- Photos of individuals taken at Club events or when individuals participate in Club activities or competitions,
- Other personal information such as personal description, dates of birth, names of family members or nannies, student status, or other information which the Club deems necessary to administer membership or the services the Club provides,

- Technical information when individuals visit the website, including the internet protocol (IP) address, login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform; information about visits, including the full Uniform Resource Locators(URL) clickstream to, through and from the Club's website (including date and time); facilities and services viewed or searched for; page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page and any phone number used to call the Club,
- Any other personal information individuals choose to give us when contacting the Club or complete any surveys or provide the Club with feedback,
- Recordings, using CCTV cameras in the club and call recordings for training and monitoring purposes
- Information received from third parties.

4. How is personal data collected?

The Club uses different methods to collect data from and about individuals, including through:

- **Direct interactions** including membership application or enquiry forms, event booking forms, other paper or online forms on the website (www.stghltc.co.uk), communications with the Club via telephone, email or other methods, when individuals participate in a Club event, registration to use the website, or reporting a problem on the website;
- **Automated technologies or interactions** including when individuals interact with our website to search for information or sign up. Technical data is collected using cookies and other similar technologies.
- **Third parties** including business partners, sub-contractors in technical, payment and delivery services, advertising networks, analytics providers, search information providers, credit reference agencies.

5. Cookies

The Club's website uses cookies to distinguish individuals from other users of the website. This helps the Club to provide individuals with a good experience when browsing the website and allows the Club to initiate website improvements.

6. How personal data is used?

The Club will only use individuals' personal data when the law allows. Most commonly, the Club uses information held about individuals in the following ways:

- to provide individuals with the membership benefits.
- to provide individuals with other Club services.
- to prepare an on-line members' directory comprising the names, email addresses, telephone numbers and the gender of the members of the Club for use only by members of the Club to contact each other. The Club also produce an annual diary listing the names, telephone numbers and membership category of members. Individuals may opt to limit the information included in this directory and diary or opt not to be included at all.

- to provide individuals with information about the Club, including news and events, and the services provided.
- to notify individuals about changes to our membership and other services.
- to ensure that content from the website is presented in the most user-friendly manner. The Club will contact members towards the end of their membership by post inviting them to renew their membership. For all other news and marketing information, the Club will contact individuals only by email and individuals may opt out of this service at any time.

Information the Club collects about individuals from the website:

- to administer the website and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes.
- to improve the website to ensure that content is presented in the most user-friendly way.
- to allow individuals to participate in interactive features of the website when they choose to do so.
- as part of the Club's efforts to keep the website safe and secure.
- to make suggestions and recommendations to individuals and other users of the website about goods or services the Club provides that may be of interest.

Where the Club receives information from other sources, the Club may combine this information with information individuals give and information collected about individuals. The Club may use this information and the combined information for the purposes set out above (depending on the types of information received). Individuals' relationship with the Club will determine why particular information is collected.

Most of the processing the Club does is necessary for the administration of the membership contract. The Club may process some personal data for a legitimate business interest such as CCTV monitoring and will need individuals consent for some processes.

7. Special Categories of personal data

Special Categories personal data is data relating to:

- Physical or mental health condition

Before individuals use the Club's gym or spa, the Club will collect information about physical and mental health by asking persons to complete a form. The Club will go through this with individuals on first consultation and at other times deemed necessary. The Club will use this information to help ensure individuals' wellbeing when using the gym or the spa or receiving treatments from the Club. The Club may also collect health data if an individual is injured while using Club facilities or have a relevant medical condition. The Club will need to process this information because it may be necessary to establish any relevant facts in any future legal claims.

The Club does not routinely collect sensitive personal data unless required to by law (for example, to ensure compliance with Discrimination Laws) or to protect the vital interests of individuals.

The club will only process special category data where we have an Article 9 exception allowing us to do so, in this case, this is case we rely on Article 9(2)(h) – Health or Social Care.

8. Disclosure of personal information

Individuals' information will be processed by staff at the Club, to fulfil obligations as outlined in this notice.

The Club may share individuals' name, email address, telephone number and gender with other members of the Club in the online members' directory and the Club's diary referred to above. If individuals have requested that the Club do not share this information, the Club will abide by the request.

The Club may also share information with selected third parties including:

- Business partners, suppliers, and sub-contractors for the performance of any contract entered with individuals.
- third party service providers who perform functions on behalf of the Club under contract, such as CCTV operators who operate the Club's security cameras.
- analytics and search engine providers that assist in the improvement and optimisation of the Club's website.
- credit reference agencies for the purpose of assessing individuals credit score where this is a condition of the Club entering into a contract with you; and
- if the Club is under a duty to disclose or share individuals personal data in order to comply with any legal obligation, or in order to enforce any agreement the Club have entered into with individuals or to collect debts owing from individuals to the Club; or to protect the rights, property, or safety of the Club, other members, or other individuals. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

The Club requires all third parties to respect the security of personal data and to treat it in accordance with the law. The Club does not allow third-party service providers to use individuals' personal data for their own purposes and only permit them to process individuals' personal data for specified purposes and in accordance with the Club's instructions.

9. Individuals' rights

In this Section, we have summarised the rights that you have under General Data Protection Regulation. Some of the rights are complex, and not all the details have been included in our summaries. Accordingly, you should read the relevant laws and guidance from the regulatory authorities for a full explanation of these rights.

Your principal rights under General Data Protection Regulation are:

- The right to access information the Club holds about individuals, why the Club has that information, who has access to the information and where the Club obtained the information from.
- The right to correct and update the information the Club holds about individuals. If the data the Club holds about individuals is out of date, incomplete or incorrect individuals can inform the Club to ensure data is updated.
- Individuals have the right to have information erased. If they feel the Club should no longer be using that data individuals can request that the Club erase the data that is held. Upon receiving a request for erasure, the Club will confirm whether it has been deleted or a reason it cannot be deleted (for example because the Club has a legal obligation to keep the information or the Club need it for a legitimate interest).
- The right to object to processing of individuals data persons. Upon receiving a request, the Club will contact the individual and confirm if the Club are able to comply or if the Club has legitimate grounds to continue to process the data. Even after individuals exercise their right to object, the Club may continue to hold the data to comply with other rights or bring or defend legal claims.
- The right to data portability. Individuals have the right to request that the Club transfer individual's data to another controller.
- The right to request restriction of processing of personal data. This enables persons to ask the Club to suspend the processing of personal data: (a) if individuals want the Club to establish the data's accuracy; (b) where the use of the data is unlawful but individuals do not want the Club to erase it; (c) where persons need the Club to hold the data even if the Club no longer require it if the individual needs it to establish, exercise or defend legal claims; or (d) individuals have objected to the Club's use of data but need to verify whether the Club has an overriding legitimate grounds to use it.
- The right to withdraw consent at any time where the Club are relying on consent to process individuals' personal data, such as for marketing purposes or for inclusion in the Club's on-line members' directory. The Club will usually inform individuals (before collecting data) if the Club intend to use data for such purposes. Individuals can exercise their right to prevent such processing by checking certain boxes on the forms the Club uses to collect data.

Individuals requiring exercising their rights should do so by writing to:

St George's Hill Lawn Tennis Club, Weybridge, Surrey, KT13 0LL

Or

e-mail: dataprotection@stghltc.co.uk

10. International transfers

The data that the Club collects from individuals is stored on the Club's own secure servers, but may be transferred to, and stored at, a destination outside the European Economic Area ("EEA"). It may also be processed by staff operating outside the EEA who work for the Club or for one of the Club's suppliers. Such staff may be engaged in, among other things, the fulfilment of orders, the processing of payment details and the provision of support services. The Club's website is also accessible from outside of the UK/EEA.
The Club may share personal information to third parties outside of the European Economic Area (EEA). Any personal information transferred will only be processed on our instruction and we ensure that information security at the highest standard would be used to protect any personal information as required by the Data Protection laws.
Where personal data is transferred outside of the EEA/UK to a country without an adequacy decision, we will ensure appropriate safeguards are in place prior to the transfer.

These could include:

- EU Standard Contractual Clauses + UK Addendum
- Binding Corporate Rules
- An exception as defined in Article 49 of the EU GDPR

Where the Club have issued (or where individuals have chosen) a password which enables persons to access certain parts of the Club's website, individuals are responsible for keeping this password confidential. The Club ask you not to share a password with anyone. Unfortunately, the transmission of information via the internet is not completely secure. Although the Club will do its best to protect personal data, the Club cannot guarantee the security of data transmitted to the website; any transmission is at individuals own risk. Once the Club has received information, the Club will use strict procedures and security features to try to prevent unauthorised access.

11. Data security

The Club have appropriate security measures in place to prevent personal data from being accidentally lost, used, or accessed in an unauthorised way, altered, or disclosed. In addition, the Club limits access to personal data to those employees, volunteers, and other third parties who have a need to know. They will only process personal data on the Club's instructions, and they are subject to a duty of confidentiality.

The Club have put in place procedures to deal with any suspected personal data breach and will notify individuals and any applicable regulator of a breach where the Club are legally required to do so.

12. Consent

Where you have given consent for processing, or explicit consent in relation to the processing of special category data, you have the right to withdraw this consent at any time, but this will not affect the lawfulness of processing based on consent before its withdrawal.

13. How long the Club will keep your personal data.

The Club will only retain personal data for as long as necessary to fulfil the purposes for which it was intended.

To determine the appropriate retention period for personal data, the Club consider the amount, nature, and sensitivity of the stored data, the potential risk of harm from unauthorised use or disclosure of personal data, the purposes for which the Club process personal data and whether the Club can achieve those purposes through other means, and the applicable legal requirements. For example, financial and statutory reporting requirements mean the Club must keep certain records for a period of 8 years.

In some circumstances the Club may anonymise personal data (so that it can no longer be associated with an individual) for research or statistical purposes in which case the Club may use this information indefinitely.
The Club's website may, from time to time, contain links to and from the websites of our partner networks, advertisers, and affiliates. If users follow a link to any of these websites, please note that these websites have their own privacy policies and that the Club does not accept any responsibility or liability for these policies. Please check these policies before submitting any personal data to these websites.

14. AUTOMATED DECISION MAKING

Your personal data is not used in any automated decision making (a decision made solely by automated means without any human involvement) or profiling (automated processing of personal data to evaluate certain conditions about an individual).

15. Complaints and contact

The Club aims to ensure all information collected about individuals is done so fairly and lawfully, whilst implementing appropriate measures to keep your information secure.

If individuals are not satisfied with the information provided in this notice, persons have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk). If individuals remain dissatisfied, then they have the right to apply directly to the Information Commissioner for a decision. The Information Commissioner can be contacted at: -

The Information Commissioner, 4th Floor, No.3 Circle Square, 5 Hawkshaw Street, Manchester, M1 7BL
Switchboard: 01625 545 700

Data Protection Help Line: 01625 545 745

The Club would, however, appreciate the chance to deal with any concerns before persons approach the ICO so please contact the Club in the first instance so queries can be resolved or provide individuals with additional information required.

Questions, comments and requests regarding this privacy notice and any complaints should be addressed to the Club's data protection representative, Miles Hill, by post to St. Georges Hill Tennis Club, St. Georges Hill, Weybridge, Surrey KT13 0LL or by email to dataprotection@stghltc.co.uk.

16. Policy Review and Amendments

We keep this Policy under regular review. This Policy was last updated on 03/04/25

We reserve the right to update this privacy notice at any time, and we will provide you with a new privacy notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.