



# Privacy Policy

Living Tennis Limited & PD Tennis Limited commitment to Privacy

- Introduction
- The information we collect about you
- The information provided to us
- How we use your information
- Our legal bases for processing your information
- Your rights and contacts
- Changes to our Privacy Policy

## Introduction

Living Tennis Limited & Delgado Tennis Limited ("LT", "we", "our", "us") take the protection of the data that we hold about players, parents of players, coaches, contractors, employees and third parties such as Schools, seriously and will do everything possible to ensure that data is collected, stored, processed, maintained, cleansed and retained in accordance with the Data Protection Act (DPA) 1998 up to 24 May 2018 and the General Data Protection Regulation (GDPR) on and from 25 May 2018 (Data Protection Legislation).

Please read this privacy policy carefully to see how LT will treat the personal information that you provide to us either when using this website ([www.livingtennis.co.uk](http://www.livingtennis.co.uk)), or in booking our various tennis coaching services, or in other circumstances when we collect data from you (including via email). We will take reasonable care to keep your information secure and to prevent any unauthorised access.

The website is maintained by Living Tennis Limited & PD Tennis Limited (LT). For the purposes of data protection legislation, LT is the data controller.

This policy explains how the information we collect about you is used and kept securely. It also explains your privacy choices when using our website as well as your right to access your information under Data Protection Legislation.

## The information we collect about you

We may collect the following information about you through our website, portals and delivery of services:

- Your name, email address, telephone, postal address and any other information you voluntarily provide to us via our website and online forms. Including third party website booking platforms such as Ticket Tailor.

Living Tennis Limited (Registered number 07889926) Address: Bisham abbey NSC, Bisham Village, Marlow Rd, Bisham, Marlow, Buckinghamshire SL7 1RR

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- Your IP address (which is a unique identifier that computers and devices used to identify and communicate with each other) which is automatically recognised by the web server.

#### The information provided to us

In becoming a junior player, adult player, parent of a player, coach or contractor, employee, official or volunteer, we will collect certain information about you which will include your name, date of birth, gender, number, email address, address, telephone number, CV and where necessary medical information. We will also collect the full name, address and telephone numbers of emergency contacts nominated by you. You may also choose to provide us with other information on you. Once registered, we will also access information about competitions you participate in (the date, name and venue of competitions, your personal results, records, rankings).

#### How we use your information

We may use your personal information for several purposes, including:

- Administer your involvement (play or work) in Living Tennis Limited & PD Tennis Limited;
- To fulfill a contract with you if you become a pro academy player;
- To notify you about important updates and information about the service you have paid for;
- To deal with your requests and enquiries;
- To contact you for reasons related to your enquiry;
- To use your IP address to monitor traffic and gather browsing behaviours of visitors to our websites. We will not use your IP address to identify you in any way;
- To create meaningful, actionable analysis on an anonymised basis.

#### Our legal bases for processing your information

Living Tennis & PD Tennis Limited key purpose it to encourage and enable participation in tennis at all levels (including participation of players, parents, coaches, officials and supporters) and to enable those with exceptional tennis talent to develop and fulfil their potential by creating and supporting competition and training opportunities.

Therefore, will process it on the basis of legitimate interest of administering your involvement in the sport of tennis to ensure the LT is running itself efficiently, with the minimum of bureaucracy.

To administer your involvement in TENNIS:

- Administering and ensuring the eligibility of players, coaches and officials and others involved in the sport – this may involve the receipt of limited amounts

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of sensitive data in relation to disabled Tennis; or in relation to anti-doping matters;

- Ensuring compliance with the current Rules and Regulations including those on the affiliation of clubs, constituent bodies and registration of players;

This will include the following:

- o The transfer of registered members from one club to another. You will maintain the same record, but the club name associated with the record will change.
- We will provide essential information regarding your affiliation to LT;
- There is an administration system where a selected number of staff can access data to help to respond to queries, update data and perform necessary administration activity;
- Providing relevant and necessary information via email, text, post and telephone to you about the following:
  - o Changes to rules and regulation
  - o Updates to advice and guidance relating to courses/coaching
  - o Transactional information relating to club affiliation, transfers, registrations, representative teams, competition and events, coach and official licenses, courses, CPD events and qualifications.

#### Record keeping, research and analysis

- Maintaining records of the game as played, in particular maintaining details of discipline and misconduct;
- Maintaining statistics and conducting analysis on the make-up of players and running participants;
- Communicating with you to ask for your opinion on Living Tennis & Delgado Tennis Limited initiatives and services

#### Website personalisation

- Providing access to all the relevant services
- Providing you with personalised information about your participation

#### Sharing data

We may share your Data with the following bodies as part of the administration of your involvement in the sport of tennis and for purposes of delivering the tasks outlined above:

- Selected persons contracted by Living Tennis & PD Tennis Limited, to provide tennis coaching who are DBS checked and approved

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- Selected members of each County LTA
- Selected members of each Area LTA
- School Officials/ Secretaries
- Third party data managers who support Living Tennis & PD Tennis Limited, in managing the businesses, for example coaches, administrators, financial controller, school representatives.

We will share only what is needed for those purposes and, where possible, will anonymise the data before sharing. If we would like to share your information for any other purpose, we will ask for your consent.

Living Tennis & PD Tennis Limited, may also share your personal information with the police and other law enforcement agencies for the purposes of crime prevention or detection. If we disclose your information, we ask the organisation to demonstrate that the data will assist in the prevention or detection of crime, or that Living Tennis & PD Tennis Limited, is legally obliged to disclose it. This is done on a strictly case by case basis and through a tightly controlled process to ensure we comply with Data Protection Legislation.

#### Marketing

When we collect information from you, we will ask you if you would like us to send you information about our products and services, events, apparel, offers and updates. We will give you the opportunity to opt in to any such communications and will tell you how you can opt-out at any time via our GDPR emailing to you.

Where you have opted in to additional communications and marketing in your subscription preferences we will process your Data on the basis of consent. When this policy is first issued we will have communicated to you about the changes and will have set your preferences to ensure you do not receive any marketing communication that you have not consented to after 25th May 2018.

Living Tennis Limited & PD Tennis Limited, may also share your personal information with the police and other law enforcement agencies for the purposes of crime prevention or detection. If we disclose your information, we ask the organisation to demonstrate that the data will assist in the prevention or detection of crime, or that Living Tennis & Delgado Tennis Limited, is legally obliged to disclose it. This is done on a strictly case by case basis and through a tightly controlled process to ensure we comply with Data Protection Legislation.

#### Protecting your information

The data that we collect from you may be transferred to a destination external to Living Tennis & Delgado Tennis Limited own secure network. We will not transfer your data outside of the European Economic Area. By submitting your personal data, you agree to this transfer, storing or processing. We will take all reasonable steps to ensure that your data is treated securely and in accordance with this privacy policy. The Internet is not generally a secure medium for communication and therefore we cannot guarantee the security of any information you send to us over the Internet. We use up-to-date industry procedures to protect your personal information. We also protect the security of your data using Secure Sockets Layer (SSL) encryption technology.

#### Email Sending Provider (ESP)

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We may use a third-party provider to deliver our regular communications. If you consent to us sending you our monthly e-newsletter, we will let you know who the third-party provider is at that time. We gather statistics around email opening and clicks using industry standard technologies including clear images to help us monitor and improve our e-newsletter.

#### Surveys

We may carry out surveys using a third-party provider. We will not transfer any data to a third party for research purposes. In each survey, we will clearly tell you what data we are collecting and provide a link to terms and conditions for any incentives offered to take part in that survey. We do not link any other information about your browsing activity with the survey data, which is stored separately. All survey data will be anonymised.

#### Third Party Links

Our Site may, from time to time, contain links to and from the websites of other tennis organisations. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

#### Your rights

Finding out what information Living Tennis Limited & PD Tennis Limited holds about you. Under the Data Protection Legislation, you can ask to see any personal information that we hold about you. Such requests are called data subject access requests. If you would like to make a subject access request, please contact us at [admin@livingtennis.co.uk](mailto:admin@livingtennis.co.uk) or write to us at: Living Tennis Limited & PD Tennis Limited, Data Protection, Bisham abbey NSC, Bisham Village, Marlow Rd, Bisham, Marlow SL7 1RR

You will also need to provide two forms of identification, for example, driving licence, utility bill or passport and, if appropriate, any about the source or location of the information you are requesting.

#### Service and marketing messages

If you are currently receiving service messages or marketing communications from Living Tennis Limited & PD Tennis Limited and no longer wish to do so, please update your privacy settings by emailing [admin@livingtennis.co.uk](mailto:admin@livingtennis.co.uk)

#### Right to be forgotten

In certain circumstances you can request us to delete all information we hold which identifies you. You can make this request at any time by emailing [admin@livingtennis.co.uk](mailto:admin@livingtennis.co.uk) but please note we may be compelled to maintain your information due to specific legislative or regulatory requirements.

#### Data corrections

You have the right to require us to correct any inaccuracies in your data free of charge. You can also exercise this right at any time by contacting us at [admin@livingtennis.co.uk](mailto:admin@livingtennis.co.uk) and:

- providing us with enough information to identify you; and
- specifying the information that is incorrect and what it should be replaced with.

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### **Data portability**

You have the right to request a copy of your personal data for you to reuse for your own purposes across different services. You can also exercise this right at any time by contacting us at [admin@livingtennis.co.uk](mailto:admin@livingtennis.co.uk)

### **Data retention**

Any data that we collect from you will be deleted in accordance with timescales set out below:

#### **Type of Data & Date of deletion**

Tennis Data four years after an individual has not played an active part in Living Tennis Limited & PD Tennis Limited. The information held such as name, address, contact details, data of birth, medical conditions, emergency numbers, will be deleted after the four-year period referred to above.

### **Complaints and contacts**

If you have any concerns or complaints in relation to how the LT collects and/or processes your personal data, you should contact the LT data protection officer in the first instance: who will direct any concerns or complaints to the individual at:

Living Tennis Limited & PD Tennis Limited, Data Protection, Bisham abbey NSC, Bisham Village, Marlow Rd, Bisham, Marlow SL7 1RR. Please use the same details to contact us with regard anything included in the Privacy Policy.

If you are dissatisfied with how your concern/complaint is dealt with by Living Tennis Limited & PD Tennis Limited, you have the right to report your concern/complaint to the Information Commissioners Office ([www.ico.org.uk](http://www.ico.org.uk)).

### **Changes to our Privacy Policy**

We regularly review our Privacy Policy and updates will appear on this page when necessary. This Privacy Policy was last updated in May 2018.

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