

## **DATA PROTECTION: PRIVACY NOTICE – SPORTS CLUB MEMBERS**

This Privacy Notice explains how Dulwich College Sports Club (“the Sports Club”) uses (or “processes”) handles the personal information (or personal data) of its members.

Any personal data provided to or gathered by the Sports Club is controlled by Dulwich College Enterprises Ltd, which owns the Sports Club.

Dulwich College Enterprises Ltd (company number 3039344) is a subsidiary of Dulwich College. Its registered office address is Dulwich College, Dulwich Common, London, SE21 7LD.

### **1. What personal data do we gather?**

The information we gather from our club users help us to continually improve your experience at the Sports Club. This personal data may include your name and contact information, date of birth, preferred communication method, bank details and credit card details. We also create information that becomes part of the personal data we hold about you, such as your membership number and information about your usage of the Club.

We may also collect and create details on joint members and other family members, where applicable, including family members under the age of 18.

We also collect the following information:

- ***Health information***

Whilst we do not generally collect health information unless it is volunteered by you, we do specifically collect health data to the extent that it is required to assess your readiness for physical exercise. We will use health information provided by you exclusively to serve you better and meet your particular needs. By providing health information to us, you are consenting to our using it for that purpose.

- ***Personal data from Children***

We do not knowingly collect personal data from individuals under 18 years of age without the permission of their parent or guardian. As a parent or legal guardian, please do not to allow your children to submit personal data without your permission.

- ***Photographs for Membership Card***

In the interests of security and the prevention of crime, we may take a digital photograph of each member to whom a membership card is issued. By providing the digital photograph to us, you are consenting to our using it for that purpose.

- **Contacting us via Website or otherwise**

When you use the [www.dcsportsclub.co.uk](http://www.dcsportsclub.co.uk) website ("Our Site") or contact us by post, telephone, fax, email or SMS, we collect, store and use certain personal data that you disclose to us. This includes details such as your name, address, telephone, fax, email and mobile phone number as well as traffic data, location data, web logs and other communication data, whether this is required for our own billing purposes or otherwise and the resources that you access. If you contact us, we may keep a record of that correspondence.

- **CCTV**

We use CCTV for security reasons. If you have any queries in relation to the use of CCTV please contact us.

- **Surveys**

We periodically ask members to complete surveys that we use for research purposes, although you do not have to respond to them.

## **2. What do we do with Personal data collected from you?**

We use your personal data to administer your membership of Dulwich Sports Club pursuant to our contract with you, including:

- to facilitate bookings of classes and appointments with our staff or third party service providers and other transactions such as the hiring spaces/facilities in the Sports Club;
- to provide the services you request from the Sports Club;
- to provide you with information about our facilities;
- to assess your readiness for physical exercise and aid your health and safety;
- to inform you about events taking place at the Sports Club (e.g. Squash and Tennis leagues);
- to let you know the timetable at the Sports Club;
- to let you know the hours that the facilities (including the pool) are available for use by members and the dates (e.g. Christmas) when the Club is closed;
- to allow you access to the Sports Club;
- to process payments and maintain accounts and records; and
- to administer and maintain membership records.

We also have a legitimate interest in processing your data for the following purposes:

- to advertise products and services and to conduct promotions (via email, telephone or post);
- to enable third parties to carry out technical, logistical or other functions on our behalf;
- to send you newsletters and promotions;
- to conduct online or telephone surveys;
- to prevent or detect fraud or other crime;
- to aid in the identification and prosecution of offenders; and

- to prevent or detect abuses of our website and IT systems.

We will also use the information in the course of collecting your membership fees and any other payments that may be due to us from you.

### **3. Squash, Golf and Tennis Leagues**

If you are playing in a Squash, Golf or Tennis league, we will need to share your contact details with other members in the league, so that they can contact you to arrange matches. We will seek your express consent to this, when you sign-up to join the league. You may withdraw your consent at any time but you will not be able to continue in the league after doing so.

### **4. Consents**

Where the Sports Club is relying on consent as a means to process personal data, you may withdraw this consent at any time. Please be aware however that the Sports Club may have another lawful reason to process the personal data in question even without your consent. That reason will usually have been asserted under this Privacy Notice or may otherwise exist under some form of contract or agreement with you.

### **5. Information sharing with third parties**

Information about our club users is an important part of our business and we do not sell it to others.

We may employ other companies and individuals to perform functions on our behalf. Examples include sending postal mail and e-mail, removing repetitive information from member lists, analysing data, and providing marketing assistance.

We receive administrative support in a number of areas from Dulwich College (including financial, HR, accounting and legal). Your personal data may be shared with Dulwich College in those contexts.

Third party service providers have access to personal data needed to perform their functions but may not use it for other purposes. Further, they must process the personal data in accordance with this Privacy Notice and as permitted by Data Protection Law<sup>1</sup>.

We release account and other personal data when we believe release is appropriate to comply with the law; enforce or operate our membership or other agreements; or protect the rights, property or safety of the Sports Club, our members or others. This includes exchanging information with other companies and organisations for fraud protection and credit risk reduction. Obviously, however, this does not include selling, sharing or otherwise disclosing personally identifiable information from members for commercial purposes in a way that is contrary to the commitments made in this Privacy Notice.

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<sup>1</sup> The General Data Protection Regulation as retained and applied in the UK ("UK GDPR") and Data Protection Act 2018 and all other data protection law and regulations

## **6. How secure is Information about me?**

We maintain physical, electronic and procedural safeguards in connection with the collection, storage and disclosure of personally identifiable information. Our security procedures mean that we may occasionally request proof of identity before we disclose personal data to you.

## **7. What about links to other websites?**

Our website may include links to other websites. We do not provide any personally identifiable customer information to these advertisers or third-party websites.

## **8. International Transfers**

Some of the IT systems and facilities we use are provided by third party suppliers who are based outside the European Economic Area<sup>2</sup> (EEA) or who use data storage facilities outside the EEA. While some countries have adequate protection for personal data under applicable laws, in other countries we will take steps to ensure appropriate safeguards apply to it. These include imposing contractual obligations of adequacy or requiring the recipient to subscribe to or be certified with an international framework of protection.

## **9. How long do we keep personal data?**

We retain personal data securely and only in line with how long it is necessary to keep for a legitimate and lawful reason. Our current retention period is for three years after a member leaves the Club, except for financial data which for tax reasons we need to keep for six years.

## **10. Data accuracy and security**

The Sports Club will endeavour to ensure that all personal data held in relation to an individual is as up to date and accurate as possible. Members should please notify the Sports Club Manager of any significant changes to important information, such as your contact details.

The Sports Club will take appropriate technical and organisational steps to ensure the security of personal data about individuals, including policies around use of technology and devices, and access to Sports Club systems. All staff will be made aware of this policy and their duties under Data Protection Law and receive relevant training.

## **11. Your rights**

Individuals have various rights under Data Protection Law, including the right to access their personal data and in some cases to ask for it to be erased or amended or for the Sports Club to stop processing it (subject to certain exemptions and limitations).

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<sup>2</sup> The European Economic Area comprises the European Union, Iceland, Norway and Liechtenstein

Any individual wishing to access or amend their personal data or wishing it to be transferred to another person or organisation, or who has some other objection to how their personal data is used, should please write to the Sports Club Manager, Dulwich College Sports Club, Dulwich College, Dulwich Common, London SE21 7LD. Email: [sharpeg@dulwich.org.uk](mailto:sharpeg@dulwich.org.uk)

Please note that certain data is exempt from the right of access. This may include information which identifies other individuals, or information which is subject to legal professional privilege.

## **12. Subject Access Requests**

The Sports Club will endeavour to respond to any Subject Access Request as soon as is reasonably practicable and in any event within statutory time-limits. The Sports Club will be better able to respond quickly to smaller, targeted requests for information. If the request is manifestly excessive or similar to previous requests, the Sports Club may ask you to reconsider or charge a proportionate fee, but only where Data Protection Law allows it.

Children can make subject access requests for their own personal data, provided that, in the reasonable opinion of the Sports Club, they have sufficient maturity to understand the request they are making. Indeed, while a person with parental responsibility will generally be expected to make a subject access request on behalf of younger children, the information in question is always considered to be the child's at law. Children aged 13 and above are generally assumed to have the requisite level of maturity to make a subject access request themselves, although this will depend on both the child and the personal data requested. All subject access requests from, or on behalf of, children will be considered on a case by case basis.

## **13. Queries or concerns**

If you have any query about this Privacy Notice or believe that the Sports Club has breached Data Protection Law, please contact the Clerk to Governors, Dulwich College, Dulwich Common, London SE21 7LD. Telephone: 0208 299 9306. Email: [legal@dulwich.org.uk](mailto:legal@dulwich.org.uk)

You also have the right to take any complaints about how we process your personal data to the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF (Tel: 0303 123 1113 Website: [www.ico.org.uk/concerns](http://www.ico.org.uk/concerns)). Please note that the ICO recommends that steps are taken to resolve matters with the relevant organisation first, before involving the ICO.

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<b>Policy Owner:</b>	Clerk to the Governors
<b>Last Reviewed:</b>	January 2023
<b>Date of Next Review:</b>	January 2025