



POLO FARM SPORTS CLUB

PRIVACY POLICY FOR OUR MEMBERS

For the purposes only of this notice, Polo Farm Sports Club (henceforth referred to as the Club) includes Canterbury Hockey Club, Canterbury Ladies Hockey Club, Canterbury Cricket Club, Canterbury Tennis Club, Canterbury Croquet Club, Canterbury Junior Hockey Club and Canterbury Tennis Academy (the associated bodies).

The Club and the individual associated bodies operate slightly different ways of contacting, receiving and storing information / data from their members according to their different needs and activities. Nevertheless, this Privacy notice is a governing document for both the Club and its associated bodies; it is addressed by them collectively to the members of both the Club and the members of each associated body. Any changes to this policy as regards compliance with the General Data Protection Regulation (GDPR) of 2018 by an associated body will be communicated directly to its members and will apply only to those members.

Hereafter references to we, our or us in this privacy notice are to Polo Farm Sports Club, Littlebourne Road, Canterbury, Kent CT3 4AF and its associated bodies. We are in the process of appointing a Data Protection Officer to oversee our compliance with data protection laws. As an interim measure, the Club's Hon Secretary will assume responsibility for data protection compliance. Contact details are set out in the 'Contacting us' section at the end of this privacy notice.

We are committed to respecting your privacy. This notice is to explain how we may use personal information we collect before, during and after your membership. This notice applies to you if you have registered to become or are already a member of the club and/or an associate body. This notice also 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** in this privacy notice are to Polo Farm Sports Club, Littlebourne Road, Canterbury, Kent CT3 4AF. We are in the process of appointing a Data Protection Officer to oversee our compliance with data protection laws. As an interim measure, the Club Hon Secretary will assume responsibility for data protection compliance in the 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 hold (usually defined as Full or Social membership), 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;

- such information as might occasionally be within a cover letter or as part of the application process for membership;
- records of your interactions with us such as telephone conversations, e-mails 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;
- Use of and movements through our online portal, passwords, personal identification numbers, IP addresses, user names and other IT system identifying information;
- records of your attendance at any events hosted by us;
- CCTV footage and other information obtained through electronic means such as entry systems;
- images in video and/or photographic form and voice recordings;
- the preferred mode by which we can contact you;
- details of any county membership for representation and playing purposes;
- 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/matches/games] attended and performance (including that generated through player pathway programme);
- 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, religious beliefs and sexual orientation;
- information about your health, including any medical condition, health and sickness records, medical records 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

- 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.

In the table below we refer to these as the “special category reasons for processing of your personal data”.

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 register an account with us at the Club’s premises, Littlebourne Road, Canterbury. Kent CT3 4AF when you purchase any services or products we offer, when you make a query and/or complaint or when you correspond with us by phone, e-mail or in some other way. We use a booking system for some of our facilities (MindBody) which has its own Privacy Policy which is fully compatible with the Polo Farm Sports Club notice.

4. USES MADE OF THE INFORMATION

The table below describes the main purposes for which we process your personal information, the categories of your information involved and our lawful basis for being able to do this.

Purpose	Personal information used	Lawful basis
To administer any membership you have with us and managing	All contact and membership details,	This is necessary to enable us to properly manage and administer your membership

<p>our relationship with you, including dealing with payments and any support, service or product enquiries made by you</p>	<p>transaction and payment information, records of your interactions with us, and marketing preferences.</p>	<p>contract with us.</p>
<p>To arrange and manage any contracts for the provision of any services or products</p>	<p>Contact details, transaction and payment information.</p> <p>Records of your interactions with us.</p>	<p>This is necessary to enable us to properly administer and perform any contract for the provision of any services and products you have purchased from us.</p>
<p>To send you information which is included within your membership benefits package, including details about advanced fixture information, competitions and events, partner offers and discounts and any updates on Hockey, Cricket, Tennis or Croquet.</p>	<p>Contact and membership details.</p>	<p>This is necessary to enable us to properly manage and administer your membership contract with us.</p>
<p>To send you other marketing information we think you might find useful or which you have requested from us, including our newsletters, information about membership, events and products. We do not propose to have any commercial partners as such but we may occasionally send information from club sponsors that we believe might be of interest to you. The club will note and respect the preference of those who do not wish such information to be sent to them.</p>	<p>Contact details and marketing preferences.</p>	<p>Where you have given us your explicit consent to do so.</p>
<p>To answer your queries or complaints</p>	<p>Contact details and records of your interactions with us</p>	<p>We have a legitimate interest to provide complaint handling services to you in case there are any issues with your membership.</p>
<p>Retention of records</p>	<p>All the personal information we collect.</p>	<p>We have a legitimate interest in retaining records whilst they may be required in relation to complaints or claims. We need to retain records in order to properly administer and manage your membership and run our club and in some cases, we may have legal or regulatory obligations to retain records.</p> <p>We process special category personal data based on the “special category reasons for processing of your personal data” referred to in section 2 above.</p> <p>For criminal records history we process it based on legal obligations or based on your</p>

		explicit consent.
The security of our IT systems	Your usage of our IT systems and online portals.	We have a legitimate interest to ensure that our IT systems are secure.
To conduct data analytics studies to better understand event attendance and trends within the sport	Records of your attendance at any events or competitions hosted by us.	We have a legitimate interest in doing so to ensure that our membership is targeted and relevant.
For the purposes of promoting the club, our events and membership packages.	Images in video and/or photographic form.	Where you have given us your explicit consent to do so.
To comply with health and safety requirements	Records of attendance, CCTV footage and other information obtained through electronic means such as entry records.	We have a legal obligation and a legitimate interest to provide you and other members of our organisation with a safe environment in which to participate in sport. We process special category personal data based on the “special category reasons for processing of your personal data” referred to in section 2 above.
To arrange for any trip or transportation to and from a match or event	Identification documents details of next of kin, family members and emergency contacts, transaction and payment information, health and medical information.	This is necessary to enable us to make the necessary arrangements for the trip and/or transportation to an event. We process special category personal data based on the “special category reasons for processing of your personal data” referred to in section 2 above.
To use information about your physical or mental health (including any injuries) or disability status, to ensure your health and safety and to assess your fitness to participate in any events or activities we host and to provide appropriate adjustments to our sports facilities.	Health and medical information	We process special category personal data based on the “special category reasons for processing of your personal data” referred to in section 2 above.
To gather evidence for possible grievance or disciplinary hearings	All the personal information we collect	We have a legitimate interest in doing so to provide a safe and fair environment for all members and to ensure the effective management of any disciplinary hearings, appeals and adjudications. We process special category personal data on the basis of the “special category reasons for processing of your personal data” referred to in section 2 above. For criminal records history we process it on

		the basis of legal obligations or based on your explicit consent.
For the purposes of equal opportunities monitoring	Name, title, date of birth gender, information about your race or ethnicity and health and medical information	We have a legitimate interest to promote a sports environment that is inclusive, fair and accessible. We process special category personal data based on the “special category reasons for processing of your personal data” referred to in section 2 above
To comply with legal obligations, for example, regarding people working with children or vulnerable adults to comply with our safeguarding requirements	Information about your criminal convictions and offences	For criminal records history we process it on the basis of legal obligations or based on your explicit consent.

For some of your personal information you will have a legal, contractual or other requirement or obligation for you to provide us with your personal information. If you do not provide us with the requested personal information we may not be able to admit you as a member or we may not be able to properly perform our contract with you or comply with legal obligations and we may have to terminate your membership. For other personal information you may not be under an obligation to provide it to us, but if you do not provide it then we may not be able to properly perform our contract with you.

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.

5. DIRECT MARKETING

Email, post and SMS marketing: from time to time, we may contact you by email, post or SMS with information about activities, services and products we believe you may be interested in.

We will only send marketing messages to you in accordance with the marketing preferences you set. You can then let us know at any time that you do not wish to receive marketing messages by contacting the parent club or the club within Polo Farm with which you are most familiar. You can also unsubscribe from our marketing by clicking on an unsubscribe link in the marketing messages we send to you.

6. DISCLOSURE OF YOUR PERSONAL INFORMATION

We share personal information with the following parties:

- **Any party specifically 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.
- **Service providers** used by us in the management of our activities or as intermediaries in any transaction between us and you, provided we are satisfied that they comply with the GDPR regulations with regard to your personal information;
- **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. **TRANSFERRING YOUR PERSONAL INFORMATION INTERNATIONALLY**

The personal information we collect may be transferred to and stored in countries outside of the UK and the European Union. Some of these jurisdictions require different levels of protection in respect of personal information and, in certain instances, the laws in those countries may be less protective than the jurisdiction you are typically resident in. We will take all reasonable steps to ensure that your personal information is only used in accordance with this privacy notice and applicable data protection laws and is respected and kept secure and where a third party processes your data on our behalf we will put in place appropriate safeguards as required under data protection laws. For further details please contact us by using the details set out in the 'Contacting us' section below.

8. **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 a legal requirement, we retain all physical and electronic records for a period of 6 years after your last contact with us or the end of your membership. Exceptions to this rule are:

- CCTV records which are held for no more than 28 days unless we need to preserve the records for the purpose of prevention and detection of crime;
- Details regarding unsuccessful membership applicants where we hold records for a period of not more than 12 months after the decision on membership has been made;
- Information that may be relevant to personal injury or discrimination claims may be retained until the limitation period for those types of claims has expired. For personal injury or discrimination claims this can be an extended period as the limitation period might not start to run until a long time after the event.

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 may be able to update some of the personal information we hold about you through our membership portal. Alternatively, you can contact us by using the details set out in the '**Contacting us**' section below.

9. **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.

10. 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.

11. CONTACTING US

In the event of any query or complaint concerning the information we hold about you, please e-mail manager@polofarm.org or write to us at The Manager, Polo Farm Sports Club, Littlebourne Road, Canterbury. Kent CT3 4AF.

Contact can also be made with the Hon Secretary of the club or with any associated body at the same address.

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