



**CLUB
DEVELOPMENT**

GDPR Guidance (March 2018):

Internal Privacy Policy for Employees, Volunteers and Venue Officers

Attached is template privacy policy wording for venues to use as a basis for drafting their own internal privacy policy for employees, volunteers and venue officers.

This note is intended to provide general guidance on GDPR requirements but Venues must rely on their own review of this document and take legal advice on it if required.

The privacy policy should be provided to relevant individuals before 25 May 2018.

For the purposes of the General Data Protection Regulation ("GDPR") and UK data protection laws, the Controller is **INSERT NAME OF VENUE** (the "Venue") of **INSERT ADDRESS**.

About this document

This privacy policy explains how we collect, use and share your personal data, and your rights in relation to the personal data we hold. This privacy policy concerns our processing of personal data of employees, volunteers and Venue officers.

How we collect your information

We may collect your personal data in a number of ways, for example:

- from the information you provide to us when you interact with us by making an application for a job or a volunteer or other Venue position, for example when you come for an interview or when you submit a formal application to work for us and provide your personal data in application forms and covering letters, etc.;
- from third parties, for example your previous or current employers in relation to your application to work or volunteer for us;
- during the course of your employment or engagement as a volunteer or officer with us, for example when you provide your contact details to our HR staff, when you or another member of staff completes paperwork regarding your performance appraisals, and as may be generated in connection with your employment or other relationship with us more generally.

The types of information we collect

We may collect the following types of personal data about you (and your family members and 'next of kin', where relevant):

1. Contact and communications information, including:
 - your contact details (including email address(es), telephone numbers and postal address(es);
 - contact details (through various means, as above) for your family members and 'next of kin';
 - records of communications and interactions we have had with you.
2. Biographical, educational and social information, including:
 - your name, title, gender, nationality and date of birth;
 - your image and likeness, including as captured in photographs taken for business purposes;
 - details of your education and references from your institutions of study.
3. Financial information, including:
 - your bank account number(s), name(s) and sort code(s) (used for paying your salary and processing other payments);
 - your tax status (including residence status);

- Gift Aid declaration information, where relevant.
4. Work-related information, including:
- details of your work history and references from your previous employer(s);
 - your personal data captured in the work product(s) you create while employed by or otherwise engaged to work for us;
 - details of your professional activities and interests;
 - your involvement with/membership of industry bodies and professional associations;
 - information about your professional life after leaving us, where relevant (for example, where you have asked us to keep in touch with you).
5. Any other information relevant to your employment or other engagement to work for us. We may also collect special categories of data, (and criminal convictions and offences data) including:
- information revealing your racial or ethnic origin (for example, recording a member of staff's racial or ethnic origin in order to monitor our compliance with equal opportunities legislation);
 - information concerning your health and medical conditions (for example, where required to monitor and record sickness absences, take decisions as to an individual's fitness for work, for dietary needs, or to make reasonable adjustments to your working conditions or environment);
 - information concerning other characteristics such as sexual orientation (for example, in the course of investigating complaints made by you or others, for example concerning discrimination); and
 - information about certain criminal convictions (for example, where this is necessary for due diligence purposes, or compliance with employment law),

where this is necessary for your employment or other engagement to work for or volunteer with us.

How we use your information [PLEASE REVIEW THIS SECTION CAREFULLY AND AMEND, WHERE RELEVANT, TO SUIT YOUR VENUE'S CIRCUMSTANCES]

The purposes for which we may use personal data (including special categories of personal data and criminal convictions and offences data, where applicable) we collect in connection with your employment or other engagement with us include:

- administering job, volunteer or officer applications and, where relevant, offering you a job or other positions with us;
- carrying out due diligence checks on you during the application process for a role, including by checking references in relation to your education and your employment history;
- once you are employed or engaged by us in any capacity, for the performance of the contract of employment (or equivalent agreement) between you and us;
- to pay you and to administer benefits (including pensions) in connection with your employment or other engagement with us;

- for tax purposes, including transferring it to HM Revenue and Customs to ensure that you have paid appropriate amounts of tax, and in respect of any Gift Aid claims, where relevant;
- contacting you or your family members and 'next of kin' for business continuity purposes, to confirm your absence from work, etc.;
- monitoring your performance in your work, including in performance appraisals;
- monitoring and recording telephone calls, emails and internet use in accordance with our IT policies and for compliance with our legal obligations;
- for security purposes, including by operating security cameras in various locations at our premises;
- for preventing and detecting crime, and to investigate complaints and grievances;
- dealing with legal claims and requests, including those made under data protection law, or requests for disclosure by competent authorities;
- for other HR-related administrative purposes, for example to update you about changes to your terms and conditions of employment or engagement;
- external and internal audit and record-keeping purposes;
- sharing your personal data with the LTA, county tennis associations and other venues for reasonable purposes in connection with the operation of the Venue.

The basis for processing your information

We may process your personal data for the above purposes because:

- it is necessary for the performance of a contract with you (your employment contract or equivalent) or in order to take steps at your request prior to entering into such a contract;
- it is necessary for our or a third party's legitimate interests. Our "legitimate interests" include our reasonable interests in the operation of the Venue, in accordance with all relevant legal requirements;
- it is necessary to protect your or another person's vital interests (in certain limited circumstances, for example where you have a life-threatening accident or illness in the workplace and we have to process your personal data in order to ensure you receive appropriate medical attention);
- it is necessary for the establishment, exercise or defence of legal claims (for example, to protect and defend our rights or property);
- we have your specific or, where necessary, explicit consent to do so (in certain limited circumstances, for example where you provide details of your racial or ethnic origin so that we can monitor our compliance with equal opportunities legislation);
- for compliance with our legal obligations (e.g. to exercise or perform any right or obligation conferred or imposed by law in connection with employment or for the prevention and detection of crime, and in order to assist with investigations (including criminal investigations) carried out by the police and other competent authorities).

Sharing your information with others

We may share your personal data with certain third parties for the purposes set out in this privacy policy. We may share some personal data with third parties including:

- other employees, volunteers, agents and contractors where there is a legitimate reason for their receiving the information, including third parties where we have engaged them to process data on our behalf as part of administering payroll services, the provision of benefits including pensions, etc.;
- internal and external auditors and legal advisers;
- when we are legally required to do so (by a court, government body, law enforcement agency or other authority of competent jurisdiction), for example by HM Revenue and Customs;
- to a third party acquirer or investor where there is a reorganisation or sale of all or part of our business (or during negotiations for such a sale or reorganisation). In such a case we will take appropriate measures to ensure the security of your personal data;
- to the LTA and county tennis associations.

How long your information is kept

We keep your personal data only for as long as necessary for each purpose we use it. For most employee, volunteer and officer data this means we keep it for as long as you have an active employment, volunteer or officer relationship with us and for a reasonable period thereafter for accounting, tax reporting, record-keeping and legal reasons.

Your rights

Under certain circumstances, by law you have the right to:

- Request access to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have exercised your right to object to processing (see below).
- Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal data for direct marketing purposes.
- Request the restriction of processing of your personal data. This enables you to ask us to suspend the processing of personal data about you, for example if you want us to establish its accuracy or the reason for processing it. You can also withdraw your consent, where this is the basis for our processing your information (without affecting the lawfulness of our previous processing based on consent).
- Request the transfer of your personal data to another party.

Please note that the above rights are not absolute, and we may be entitled to refuse requests where exceptions apply.

If you have given your consent and you wish to withdraw it, please contact [●], using the contact details set out below.

Contact and complaints

If you have any queries about this privacy policy or how we process your personal data, or if you wish to exercise any of your rights, you may contact [●]:

- by email: [●];
- by telephone: [●];
- or by post: [●].

If you are not satisfied with how we are processing your personal data, you can make a complaint to the Information Commissioner.

You can find out more about your rights under applicable data protection legislation from the Information Commissioner's Office website available at www.ico.org.uk.