

PRIVACY POLICY

PLEASE THESE TERMS READ CAREFULLY

This policy was last updated: 23rd May 2018

About this Policy

Inside Out Tennis understands that your privacy is important to you and that you care about how your personal data is used and shared online. Where we manage personal data, we identify as a Data Controller and recognise and act on our obligations under applicable data protection laws.

For the purposes of the General Data Protection Regulation (GDPR) and relevant legislation, the Data Controller is Inside Out Tennis Ltd. For any issues relating to data protection the person responsible is Martyn Whit.

We may change this policy from time to time without notification to you.

By providing us with your data, you warrant that you are over 13 years of age.

Who we are

Inside Out Tennis provide professional tennis coaching programmes to adults and juniors, run holiday camps and run disability tennis sessions for the East Midlands Tennis Foundation Disability Network.

Inside Out Tennis Ltd is registered in England and Wales under Company Registration Number 07268873. Our registered office address is 1 Princes Court, Royal Way, Loughborough LE11 5XR. We are registered with the Information Commissioner's Office (ICO) for data protection reference number ZA391655.

What personal data do we collect?

Information that you provide to us is retained and processed in accordance with UK data protection legislation.

The types of data Inside Out Tennis holds includes:

- Personal information (name, date of birth, contact details and address (es))
- Attendance information (such as sessions attended, absences)
- Assessment information (such as coach assessments)
- Relevant medical information and / or information relating to special needs
- LTA rating and ranking of player
- British Tennis Membership number
- Disability impairment grouping where applicable (wheelchair, deaf, visually impaired, learning disability)

Data we process may relate to the following categories of personnel:

- Clients
- Students
- Trainers/Coaches
- Employees
- Suppliers
- Professional Advisors, consultants
- Complainants and Enquirers

Where do we collect data from?

We collect your data from the following interactions with us:

Inside Out Tennis Enquiry

When you submit a query to us through the website we collect details of your name and email, as well as the message you submit. This is so that we can contact you and provide details of our coaching services to you, make bookings, confirm bookings and deal with general company enquiries. Data is held on the grounds of being legitimate to our business interests.

Registration online

When you register with us for coaching through our online booking system, your details are collected by our provider, ClubSpark, who process your bookings.

ClubSpark's Privacy Policy is available at: <https://clubspark.lta.org.uk/PrivacyPolicy>

Club Membership

For coaching sessions and courses you will need to be registered as a member of the tennis venue where you are receiving coaching by Inside Out Tennis. This can be done by contacting the membership secretary of the individual venue. The venue will ask for consent to use your data including sensitive data to provide you with details of social events, competitive opportunities and membership renewals. They will also ask for consent to contact you in relation to associated 3rd parties, primarily Inside Out Tennis. We are not responsible for any data provided to the individual Clubs and you should refer to their Privacy Policy, available on the respective Club website.

Emails

We retain copies of emails that you send to us on our servers. Your personal information will be held by us in accordance with this Privacy Policy and will be on the basis of being legitimate to our business interests.

Email marketing

From time to time we may contact you to inform you of future courses, social events, holiday camps and competitive opportunities. Data is processed on the basis of valid consent obtained from you. If at any time you wish to update the information which we hold about you, or if you wish to stop receiving information from Inside Out Tennis, please contact info@insideouttennis.com. Your rights as a data subject are also listed below.

Phone calls: Phone calls to us may be recorded and any data relating to the call may be retained by us. The data will be held on the basis of being for our legitimate business needs or in order to fulfil our contractual obligations if you are a client of ours.

Social media: We use social media to engage with users and link to our Facebook and Twitter pages. We do not keep any specific data that identifies you as an individual user, but hold details of our followers on these platforms. You should refer to the Privacy Policies of these channels to understand how they treat your data in relation to linking to our site.

Facebook: <https://www.facebook.com/privacy/explanation>

Twitter: <https://www.twitter.com/en/privacy>

If you send us a direct message via social media, the details may be retained by us only as relevant to any ongoing contract or to further our legitimate business interests or as required for legal purposes. The third party provider may also retain details in accordance with their Privacy Policy.

Testimonials

We may ask you for a testimonial in relation to our coaching services that may be used on our website or social media. Personal details of those under 16 years old will not be used and any other data is only published on the basis of valid consent.

Special categories of data

Some of the information you provide to us may be considered sensitive personal data which includes information about a data subject's ethnic or racial origin, political opinions, religious beliefs, trade union membership, physical or mental health, sexual life or criminal record.

Information we get from other sources

From time to time, we may need to obtain information from third parties about you. This may include Tennis Clubs informing us of your details in order for us to provide services. Our coaches may also provide information to us to administer and manage your registration on a coaching course or holiday camp.

How do we use your data?

We may use the information we collect from you in the following ways:

- To inform only relevant coaches of squad registration, player standards and coaching level of play
- To provide only relevant coaches with player emergency contact details
- Provide Club team captains with contact details for club representation in leagues/competitions
- To undertake marketing and promotional activities
- To support player coaching
- To inform relevant team captains of LTA age group, ratings and rankings
- To contact you regarding changes to, or cancellation of, sessions
- To inform host clubs of players receiving coaching in order to facilitate club membership applications
- To administer and improve the website
- To personalise the content and your experience of the website
- To allow us to respond to communications sent to us
- To administer a contest, promotion, survey or other site feature
- To process your transactions
- To send you email notifications which you have specifically requested
- To send to you marketing communications, where expressly agreed
- To provide third parties (Club venues, Lawn Tennis Association and Tennis Foundation) with statistical information about our users
- To ask for feedback, ratings, reviews or testimonials
- To publish photographs representative of our services for promotional purposes, where explicit photo consent is obtained
- To deal with enquiries and complaints made by or about you relating to the website.

Users contacting our website and/or its owners do so at their own discretion and provide any such personal details requested at their own risk. Your personal information is kept private and stored securely until a time it is no longer required or has no use.

How is information shared?

We don't share, sell, or distribute your data to third parties, except as contractually agreed with you or as provided in this Privacy Policy.

We sometimes need to share personal data with others to provide our services and to comply with all aspects of data protection legislation. We recognise that individuals have a right to be informed about the collection and use of their personal data and that this should meet the principle of transparency under the GDPR.

Inside Out Tennis will share data in the following ways:

Disclosure

We may disclose your personal information if we are required to do so by law, in connection with any legal proceedings, and in order to establish, exercise or defend our legal rights, or if otherwise legally permitted.

Notification to Tennis Clubs

We are required to provide player contact details to the host tennis club, to enable them to process your club membership/registration. You will need to be registered as a member of the tennis venue where you are receiving coaching by Inside Out Tennis. This is required to provide our coaching services to you. Tennis Clubs may also receive copies of our coaching registers for the same purpose (this will not include any health or sensitive data). We are unable to accept bookings for players not agreeing to become club members. However, you should inform us at the time of registration if you object to your details being passed on to a Tennis Club venue by us and we will make alternative arrangements.

Tennis Clubs may act as joint Data Controllers in relation to processing your personal data and you are advised to familiarise yourself with their Privacy Policy.

Safeguarding

We have adopted the British Tennis Safeguarding Policy which is linked to our website, at <http://www.insideouttennis.com/safeguarding-policy>. All safeguarding concerns or disclosures will follow the reporting procedure set out in the Safeguarding Policy and personal or sensitive data only disclosed to others on a need-to-know basis, where there is a lawful basis to do so.

All coaches are required to undertake a DBS check and personal data held is on the basis of meeting our legal obligations.

Health and medical details and other sensitive information

We will collect details of any medical conditions that affect participation in our coaching sessions or at our holiday camp. All sensitive (or special category) data will be treated as confidential and only disclosed on a need-to-know basis. Additional security measures will be taken by us and our coaches. We also consider any medical information alongside our obligations regarding the Equality Act.

We will ask for your emergency contact details in case of an emergency and any necessary information may be disclosed in order to deal with a situation as it arises.

Photographs

We will ask for your consent to photographs when registering for our courses or holiday camp and will only take identifying pictures if we have your permission to do so. Photos may be used for the marketing purposes of Inside Out Tennis and may appear in printed promotional material, or on social media. You have the right to withdraw consent for photographs at any time by contacting us at info@insideouttennis.com

Our Coaches and Data Processors

We may use Data Processors who act on our instruction in relation to the management of personal data and they must adhere to all data protection laws and regulations. This includes coaches that we use to supply our services. Coaches are provided with personal data on a need-to-know basis, which would normally include details relating to the squad they are teaching only. Coaches must follow our data security procedures at all times. All personal data that is collected by coaches must be given to the Company for safeguarding purposes.

We will ensure that Data Processors we use only operate on our written instructions and comply with their obligations under the GDPR (General Data Protection Regulation) and all other relevant data protection legislation as may be in force from time to time.

Marketing

We will only send you emails or other marketing communications where you have previously used our coaching services and this will be on the basis of being legitimate to our business. You have the option to request that we remove your details from our mailings at any time by contacting us at info@insideouttennis.com.

We use MailChimp to send email marketing communications to you and your contact information is retrieved from records held on ClubSpark. You should refer to the Privacy Policies for these:

MailChimp: <https://mailchimp.com/legal/privacy/>

ClubSpark: <https://clubspark.lta.org.uk/PrivacyPolicy>

Non-personally identifiable visitor information may be provided to third parties for marketing, advertising or other uses.

External links

Users of the website are advised that clicking on any external web link will take you away from our website and that your continued use will no longer be governed by this Privacy Policy, or our website's terms and conditions. We cannot guarantee or verify the contents of any externally linked website and users click on external links at their own risk. Inside Out Tennis and its owners cannot be held liable for any damages, or the consequences of visiting any external links.

Social media platforms

Communication, engagement and actions taken through external social media platforms that this website and its owners participate on are subject to our terms and conditions as well as the privacy policies held with each social media platform respectively.

Users are advised to use social media platforms wisely and communicate and/or engage with them with due care and caution in regard to their own privacy and personal details. This website nor its owners will not ask for personal or sensitive information through social media platforms and encourage users wishing to discuss sensitive details to contact them through primary communication channels such as by telephone or email.

Inside Out Tennis uses social sharing buttons, which help share web content directly from web pages to the social media platform in question. Users are advised that before using such social sharing buttons, that they do so at their own discretion, and should consider that the social media platform may track and save requests to share a web page, through the users' social media platform account.

Payment processing

Inside Out Tennis accepts payment for coaching services by cash, cheque or online through Stripe. All payment details and sensitive information you supply to Stripe are encrypted via Secure Socket Layer (SSL) technology. Transactions processed online are not stored or processed on our servers. We do not share financial details with 3rd parties.

Stripe's Privacy Policy is at: <https://stripe.com/gb/privacy>

Payments made directly to us do not require us to process your personal data and only transactional data will be held, both in our manual and electronic filing systems.

How long is data kept for?

We keep your personal information in accordance with our Data Retention Policy, which reflects our needs to provide services to you as contracted and also as required to meet legal, statutory and regulatory obligations. The need to hold information is regularly reviewed and data will be disposed of when no longer required.

What security measures do we take?

Your personal data is contained behind secured networks and is only accessible by a limited number of persons who have special access rights to such systems, and are required to keep the information confidential.

We take appropriate steps to ensure a safe processing of personal data, however, we cannot guarantee the security of data transmitted through our website or by email. Any transmission is at your own risk.

Where is personal data stored?

Our website is hosted by Silver Hatch. Any information that you supply to us may be stored and processed by our servers located in the UK. Your data may be transferred in accordance with the relevant data protection laws.

What are your rights?

Inside Out Tennis recognises a data subjects rights and will uphold these in accordance with data protection laws. You are entitled to see the information held about you and you may ask us about any of the following:

Subject access requests

Data subjects (i.e. individuals) have the right to access personal data that is held by submitting a subject access request (SAR) to Inside Out Tennis. We will endeavour to respond quickly to any such requests, which legally require us to respond within one month of receiving the request and necessary information. A Subject Access Request (SAR) form can be obtained by emailing us at info@insideouttennis.com.

Right to rectification

Data subjects have the right to request that we amend or change personal information that is inaccurate or incorrect.

Right to erasure

Data subjects have the right to ask us to delete personal information from our systems without giving any reason and at any time. We will act on any such request without delay.

Right to restrict processing

Data subjects have the right to rectification or erasure of personal data in the following circumstances:

- Personal data is not accurate;
- The processing of data is unlawful - data subjects may request that processing is restricted;
- Data is required to exercise legal rights or defend legal claims;
- Data is unlawful but there may be lawful grounds for processing, which override this right.

Right to data portability

Data subjects have the right to obtain and request the transfer of their data to different service providers.

Right to object

Data subjects have the right to object to the processing of data at any time based on their particular situation. This includes objecting to profiling unless it is in the 'public interest' or exercised lawfully by an official authority. We will only process data under lawful grounds.

Right not to be subject to decisions based on automated processing

We do not use any automated processing that results in any automated decision based on a data subject's personal information.

Using your rights

If you wish to invoke any of these rights, you should contact the person responsible for data protection by emailing us at info@insideouttennis.com

Data breaches

We will report any unlawful breach of data as required by the GDPR within 72 hours of the breach occurring, if it is considered that there is an actual, or possibility, that data within our control, including the control of our data processors, has been compromised.

If a data breach is classified as 'high risk' we will notify all data subjects concerned using an appropriate means of communication. All relevant breaches will be reported to the Information Commissioner's Office (ICO), see below.

COOKIES POLICY

What are Cookies?

Cookies are small files saved to the user's computer hard drive that track, save and store information about the user's interactions and usage of the website. This allows the website, through its server, to provide the user with a tailored experience when navigating the website. Session cookies may be used to validate your access to different parts of the website.

Disabling Cookies

If you are uncomfortable with the use of cookies, you can disable cookies on your device by changing the settings in the preferences or options menu in your browser. You can set your browser to reject or block cookies or to tell you when a website tries to put a cookie on your device. You can also delete any cookies that are already stored on your device. However, please be aware that if you do delete and block all cookies from our website, parts of the site may not fully function.

How we use Cookies

The Inside Out Tennis website uses cookies and widgets to help us identify and track visitors, their usage of the website, and their website access preferences. Cookies are a user's identification card for our servers.

Where applicable this website uses a cookie control system allowing the user on their first visit to the website to allow or disallow the use of cookies on their computer or device. This complies with UK legislation, which requires that explicit consent is given by users before reading files are left, or applied, on a user's computer or device.

To the extent that cookies data constitutes personally identifiable information, we process such data on the basis of your consent.

Cookies we use

The Cookies we use are shown in this table below.

COOKIE	PROVIDER	TYPE	USE	RETENTION PERIOD
Lang	cdn.syndication.twimg.com	HTTP	Remembers user's language (PREFERENCES)	Session
i/jot/syndication	twitter.com	Pixel	Unclassified (MARKETING)	Session

Widgets

When you view Twitter content on our website, Twitter may receive information including the web page you visited, your IP address, browser type, operating system, and cookie information. You can opt out of having information collected in this way. You can refer to the Twitter Privacy Policy at: <https://www.twitter.com/en/privacy>

Consent to Cookies

If you accept the use of Cookies on this website, you consent to the processing of data about you by us and any third parties as identified above in accordance with this policy and our Privacy

Policy. You have the right to withdraw your consent at any time by emailing us at info@insideouttennis.com

Further Information

Guidelines for the processing and handling of data and use of Cookies is available from the Information Commissioner's Office, the UK supervisory authority on data protection, see ico.org.uk.

Information is also available at www.ec.europa.eu/ipg/basics/legal/cookies/index_en.html.

Important Information

Questions and queries

If you have any concerns about how we handle your data, you can contact the Data Controller by email to info@insideouttennis.com

Changes to this policy

We reserve the right to change this Privacy Policy at any time, so please review it frequently. Changes and clarifications will take effect immediately upon their posting on the website.

You will be deemed to have accepted any changes to the terms of the privacy policy on your next visit of the website following the amendment.

Complaints

If you want to raise a concern about the use of your data, you can contact us by email to info@insideouttennis.com. Alternatively, you can formally raise a concern or complaint to the Information Commissioner's Office (ICO) directly on 0303 123 1113, or see the options for reporting issues on <https://ico.org.uk/concerns/>

No Waiver

No failure or delay by us in exercising any of our rights in accordance with this Privacy Policy or our terms and conditions shall be deemed to be a waiver of that right, and no waiver of a breach of any provision of the Agreement shall be deemed to be a waiver of any subsequent breach of the same or any other provision.

Severance

If one or more of the provisions of this Privacy Policy or our terms and conditions is found to be unlawful, invalid or otherwise unenforceable, those provision(s) shall be deemed severed from the remainder of these terms and conditions and shall remain enforceable.

Third Party Rights

The terms of this Privacy Policy shall not confer rights on any third parties and accordingly the Contracts (Rights of Third Parties) Act shall not apply.

Jurisdiction and Governing Law

The terms of this Privacy Policy and all disputes, whether contractual or otherwise, arising out of or in connection with the policy are governed by and shall be construed in accordance with the laws of England and Wales and each party submits to the exclusive jurisdiction of the English courts.