

# Privacy Policy



*At Warrington Sports Club, we're committed to protecting and respecting your privacy.*

This document explains when and why we collect personal information about people who visit our website, how we use it, the conditions under which we may disclose it to others and how we keep it secure.

We may change the Policy from time to time so please check this page occasionally to ensure that you're happy with any changes. We include the date in the title, so that it is easier to see if it has been changed. By using our website, you're agreeing to be bound by this Policy.

If you have any questions regarding this Policy or our data practices, these should be sent post or email using the contact information under the "Info & Join" tab on the website or on the WSC SportyHQ Platform.

## Who are we?

Warrington Sports Club (the "**Club**") is a private multi-sports club, which is run for the benefit of its members by elected representatives. It is a not for profit organisation operating at its Walton Lea site where it has been located for the last 50 years. The individual sports are affiliated to the applicable national sporting bodies. We can be contacted using the contact information above.

## What is Personal Information?

When we talk about Personal Information, we mean information about an individual that can identify them, like their name, address, e-mail address, telephone number, an image and financial details.

## How do we collect information from you?

We obtain Personal Information about you when you complete the Membership Form, when you use our website, for example to browse or to book a court, or when you use your Membership Card. Most of your Personal Information is held on our Membership Database or on other computerised records. Some information is held in paper form.

# What type of information is collected from you?

We may collect and process the following information about you:

Type of Data	Description	Examples of how we use it
<b>Contact</b>	<ul style="list-style-type: none"><li>Who you are</li><li>Where you live</li><li>How to contact you</li></ul>	<ul style="list-style-type: none"><li>Process your membership</li><li>Analysis and profiling</li><li>Notices about the Club</li><li>Analysis and profiling</li></ul>
<b>Personal details</b>	<ul style="list-style-type: none"><li>Age</li><li>Gender</li><li>Family details</li><li>Image</li></ul>	<ul style="list-style-type: none"><li>Process your membership</li><li>Security</li><li>Analysis and profiling</li><li>Emergency contact details</li></ul>
<b>Transactional</b>	<ul style="list-style-type: none"><li>Bank and/or card details</li><li>How you use the Club</li><li>Changes you make to your account</li></ul>	<ul style="list-style-type: none"><li>Paying for your services</li><li>Door entry</li><li>Bookings/competitions</li><li>Preferences</li></ul>
<b>Contractual</b>	<ul style="list-style-type: none"><li>Membership renewal date</li><li>Membership type</li><li>Booking type and history</li></ul>	<ul style="list-style-type: none"><li>Process your membership</li><li>Analysis and profiling</li></ul>
<b>Consent &amp; Preferences</b>	<ul style="list-style-type: none"><li>Image use (under 16)</li><li>Notifications/confirmations</li></ul>	<ul style="list-style-type: none"><li>Website/Marketing</li><li>Booking reminders</li></ul>

If you set up a Direct Debit, your bank details are not held by us: it is collected by our third party payment processors, who specialise in the secure banking transactions. When you use your Membership Card, the till system and door systems (when implemented) record transactions and event data.

Junior Squash has paper consent records that separately provide parental contact numbers for the Juniors at the Saturday morning sessions and, when appropriate, parental consent for their children to appear on the Junior Squash page, posters and in the website picture gallery. These records are held by the Junior Squash Manager.

Similarly, contact details are collected when you book a room or function at Warrington Sports Club. These may include dietary requirements and bank details. We also record CCTV images at various points around the Club for the purposes of safety and security.

## How is your information used?

We use personal information that we hold about you to:

- process membership registration or renewal (including verification and security checking) that you have requested
- create and generate login credentials and access controls for online services or door control systems;
- process bookings that you have requested;
- carry out our obligations arising from any contracts entered into by you and us;
- notify you of changes to our subscriptions or terms and conditions;

- process entries in a competition;
- profile the membership and its preferences;
- make Club announcements and notify you of events at the Club;
- analyse the effectiveness of the website and email communications. We collect standard Internet log information and details of visitor behaviour patterns. We gather statistics around email opening and clicks using standard industry technologies.
- send you automated confirmatory notifications and reminders. We also may send you newsletters that may be of general interest about what is going on at the Club, in sports at the Club and locally;
- provide Information, Marketing and Offers.

We process your personal information to administer the **Contract** we have with you, using your information that you have provided to us. Subject to the rules of the Club, Members of Warrington Sports Club are entitled to use the Club and its facilities to the extent requested, for example; to play a particular sport or book a Court. We are doing things that you have asked us to do and for which a fee is payable. We have a **Legitimate Interest** in contacting current members to manage their membership and to notify you about Club activities. By joining a private Club, we consider there is reasonable expectation of you to receive communications from us about the running of the Club and its activities, particularly when it may limit access to the facilities available. We need to analyse our membership structure and understand how effective our communications are to be able to manage the Club in the future. We may provide you with confirmations, marketing information and offers if you have provided your **Consent** for us to do so. You can relinquish that consent at any time.

We review our retention periods for personal information on a regular basis. We are legally required to hold some types of information to fulfil our statutory obligations (for example the collection of Gift Aid). We will hold your personal information on our systems for as long as is necessary for the relevant activity, or 7 months after your Membership has lapsed, unless you tell us otherwise. This is in case you change your mind and wish to re-join at the next renewal date. CCTV images are automatically overwritten after short period, unless an incident is under investigation and the images are potential evidence of a crime.

You have the right to complain to Information Commissioner's Office if you have a concern about our information rights practices. The address is Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF and the telephone number is 0303 123 1113.

## Who has access to your information?

We will not sell or rent your information to third parties and we will not share your information with third parties for marketing purposes. We limit access to your information by Club Officials strictly on a need to know basis.

## Third Party Service Providers working for us

We may pass your information to our third party service providers, agents and other associated organisations for the purposes of completing tasks and providing services to you (for example to collect Direct Debits, process bookings and to send you mailings). However, when we use third party service providers, we disclose only the personal information that is necessary to deliver that service and they are required to keep your information secure and not to use it for their own direct marketing purposes. We will not release your information to other third parties for them to use for their own direct marketing purposes.

We use SportyHQ as the platform for our club management system. SportyHQ holds our membership, booking, and box League details and hosts our website. GoCardless and Stripe are our service providers for Direct Debits and for card payments.

## Your choices

You have a choice about whether or not you wish to receive certain information from us and what information is displayed about you. If you do not want to receive direct communications from us about, for example peak time availability of courts, or change your privacy settings, then you can select your choices by ticking the relevant boxes situated on the forms in your User Profile. You can change your preferences at any time by revisiting the relevant forms.

## How you can access and update your information

The accuracy of your information is important to us as it is the primary means of communicating with you. When you first join the Club, we record the information completed on the Membership Application form. On renewal, we assume the information is unchanged unless you tell us differently. Most of the information can be updated on line or, if you wish, inform the Membership Secretary of the changes and the records will be updated. You have the right to ask for details of the personal information we hold about you and you can do this by contacting the Membership Secretary.

## Security precautions in place to protect the loss, misuse or alteration of your information

When you give us personal information, we take steps to ensure that it's treated securely. We limit the number of people with direct access to your information for administration purposes and limit the scope of any information provided to other officials of the Club when it is necessary to do so. We do not have access to your passwords.

When a sum of money is due for collection by Direct Debit, the system prompts our third party provider to process the Direct Debit request using the details you supplied to them. We only receive the proceeds of the transaction and are not involved in the collection process itself.

Non-sensitive details (your email address etc.) are transmitted normally over the Internet, and this can never be guaranteed to be 100% secure. The website is SSL certified and information transmitted is encrypted. While we strive to protect your personal information, we cannot guarantee the security of any information you transmit to us, and you do so at your own risk. Once we receive your information, we make our best effort to ensure its security on our systems. Where we have given (or where you have chosen) a password, which enables you to access certain parts of our websites, you are responsible for keeping this password confidential. We ask you not to share your password with anyone.

## Profiling

We may analyse your personal information to create a profile of our membership and preferences so that we can better manage the Club.

## Use of 'cookies'

Like many other websites, the Warrington Sports Club website uses cookies. 'Cookies' are small pieces of information stored on your hard drive to allow that website to recognise you when you visit. They also collect statistical data about your browsing actions and patterns and do not identify you as an individual. This helps us to improve our website. It is possible to switch off cookies by setting your browser preferences.

## Links to other websites

Our website may contain links to other websites run by other organisations. This privacy policy applies only to Warrington Sports Club and its website, so we encourage you to read the privacy statements on the other websites you visit. We cannot be responsible for the privacy policies and practices of other sites even if you access them using links from our website.

In addition, if you linked to our website from a third-party site, we cannot be responsible for the privacy policies and practices of the owners and operators of that third party site and recommend that you check the policy of that third party site.

## 16 or Under

We are concerned to protect the privacy of children aged 16 or under. If you are aged 16 or under, please get your parent/guardian's permission beforehand whenever you provide us with personal information.

## Review of this Policy

We keep this Policy under regular review. This Policy was last updated on 16<sup>th</sup> December 2022.