

# CHILTERN CROQUET ACADEMY DATA PROTECTION POLICY



## Introduction

The Chiltern Croquet Academy (CCA) is committed to keeping your information safe and to meet our obligations under the General Data Protection Regulation ("GDPR") to process it fairly.

## Purpose

This data protection policy explains how personal information ("the data") collected as a result of course bookings may be used.

It also incorporates our Data Privacy Notice which:

- Describes how we process the data we hold about you, or that you are about to share with us.
- Outlines your rights if you feel we are not meeting our obligations under the GDPR.

## COURSE BOOKINGS

You should be aware that, by entering an Academy course or event, your personal data, including contact details, handicaps, ranking grade, payment information and CVD information, may be used for administering, managing and reporting that course / event. This includes course / event administration, management, reporting, publicity, handicapping, ranking and selection purposes, and may also include the capture and broadcast of photographs or video. Payment information will not include credit card details, as payments are processed by a separate organisation (SagePay). (This mirrors the advice given in CA's Tournament Regulations para P3k).

## DATA PRIVACY NOTICE

### Identity and Contact Details

The Controllers of the data are the CCA, which is part of the High Wycombe Croquet Club, a Community Amateur Sports Club. The CCA operates directly through our Management Board and coaches when they are acting on our behalf. We can be contacted through our [office](#):

The Chiltern Croquet Academy  
c/o Hope Cottage  
6 Orchard Way  
Holmer Green  
High Wycombe  
Bucks  
HP15 6RF

e-mail: [info@chilterncroquetacademy.org](mailto:info@chilterncroquetacademy.org).

Please identify any correspondence related to this notice with the subject "Data Protection: FAO CCA Manager".

The CCA is not required to appoint a Data Protection Officer as defined by GDPR: its Management Board members are jointly responsible for ensuring that data protection issues are dealt with by the organisation.

### **Purpose and Lawful Basis for Processing**

The CCA processes (or will process) information about you in order to support its coaching activities.

The lawful basis for holding personal records is to fulfil the contract with you as a participant (or potential participant) of the CCA. More generally, the lawful basis for the processing described above is that it is in the legitimate interests of the CCA in pursuit of its objective to "To provide a broad range of high standard croquet coaching."

The CCA also processes personal data relating to current or potential contracts with landlords, suppliers or service providers, under the lawful basis of fulfilling or entering into those contracts.

### **Categories of Personal Data**

The CCA may hold and process the following categories of structured personal data about its current or potential participants, contacts and those engaging in activities run under its auspices:

- Name.
- Contact Details (e.g. postal, e-mail and social media addresses and telephone numbers).
- Financial information relating to course entries. No credit card details are held by the CCA online and bank account details (for direct debits) are stored offline.

- Handicaps, rankings, eligibility criteria (including nationality, residency and date of birth), qualifications and awards.
- CA and Club membership.
- Positions held within the CCA.
- Entries to, schedules for and results of courses.
- Disabilities, such as colour vision deficiency, where to do so would facilitate your participation.
- Photographs.

The CCA may also hold data relating to contracts with third parties, as noted above.

In addition, unstructured personal data relating to you may be held in e-mails sent to or from you, or between those acting on behalf of the CCA, and in logs of any requests you make to its website.

### **Information Sharing**

The CCA will not pass your data to anyone without your consent, except where necessary to provide its services, as detailed below:

- It may share financial data relating to you with its payment processor, banks and BACS processor, for the purpose of collecting payments or making refunds.
- It may share your data with clubs to which you belong, for the purpose of maintaining accurate membership records.
- It may share information held about you with members of its Management Board and coaches delivering its courses, to enable them to fulfil their roles within the organisation.
- It may publish news, including photographs, course results and commentary on its website [or social media sites].
- Its website may share information about your use of it with search engine providers, for the purpose of optimising it (and, whilst not the responsibility of the CCA, software on devices you use to access it might harvest data relating to your use of it).
- It will give information about you when legally required to do so.

### **Location of Data Processing**

The data is processed on computers (and backups of them) operated by the CCA, on those operated by its service providers (e.g., for its website, email, payments, and banking), and on paper records. These are all normally located in the UK, European Union or countries which have equivalent data protection safeguards.

## **Retention Periods**

Except where required for archiving purposes (such as records of CCA activity, such as minute books and course lists), data about you will be deleted no later than six years after you were last a participant with or had financial dealings with the CCA.

## **Your Rights**

You have the right to object to how the CCA processes your personal information. In particular, you can request that your contact details are not shown in published lists. You also have the right to access, correct, and, in some cases, delete and restrict the use to which your information is put, but your participation in events may be restricted if you do so. In addition, you have the right to complain to the CCA (see the first section for contact details) and to the Information Commissioner at <http://ico.org.uk/global/contact-us>.

Please contact the CCA (using the contact details above) in the first instance if you have any queries or concerns.

## **Data Sources**

The primary source for the data held about you is the information you provided, or are about to provide, when booking a CCA course or subsequently updating it, either directly or through the CA website. Those acting on behalf of the CCA in running its activities are a secondary source of data for your results, handicaps, qualifications, etc.

## **Consequences of Failing to Provide Data**

If you do not provide the information required by the CCA to join a coaching activity, then you will be unable to participate in it. The CCA requires at least a postal address to ensure that it can contact its participants.

## **Automated Decision-Making**

No automated decision-making software is used by the CCA.

## **Amendments**

We may update this policy from time to time by publishing a new version on our website: significant changes will be notified in a [news](#) item.

## **Change Log**

Significant changes since version 1,2 Jan 2021:

Version 2.2, 27 Feb 2021:

1. Broaden the document into a Data Protection Policy containing the Data Privacy Notice.
2. Incorporate the contents of the Data Protection para from the CA's Tournament Regulations (Para P3k).
3. Minor typographical and formatting changes.