



# Dublin Lawn Tennis Council

## Privacy Policy

This policy is to explain how the Dublin Lawn Tennis Council (DLTC) may use personal information submitted by you through your club or another method, for example by registering to play League or playing league. It explains how we comply with the law on data protection and what your rights are in relation to this policy.

References to **organisation, we, our** or **us** in this privacy policy are to DLTC, C/O David Lloyd, Riverview, Beech Hill, Clonskeagh, Dublin 4. The DLTC may also need to transfer your personal information to agents or sub-contractors – who will process it strictly on the DLTC's behalf.

We have appointed a Data Protection Coordinator to oversee our compliance with data protection laws. In the vast majority of cases, we are the Data Controller of personal data processed as described in this privacy policy for the purposes of Irish Data Protection legislation and the EU General Data Protection Regulation (GDPR).

This Privacy Policy describes our approach to privacy. It includes detailed information about the type of personal data that we process and how it is processed by the DLTC.

Contact details are set out in the "Contact Us" section at the end of this privacy policy.

Whose data we may have	In operating the organisation, we process personal data of players, employees, Committee Members, Officials, Post Holders, and Website Visitors.
What data do we process	Depending on the type of interaction with us, you may initially provide us with or we may obtain <b>personal information</b> about you, such as information regarding your: <ul style="list-style-type: none"><li>• personal contact details that allows us to contact you directly such as name, title, email addresses and telephone numbers;</li><li>• date of birth, gender;</li><li>• records of your interactions with us such as telephone conversations, emails and other correspondence and your instructions to us;</li><li>• records of your attendance at any events hosted by us;</li><li>• CCTV footage and other information obtained through electronic means;</li><li>• images in video and/or photographic form and voice recordings;</li><li>• records of any player rankings, grading or ratings, competition results, details regarding events/matches/games attended and performance;</li><li>• any disciplinary and grievance information</li></ul>
Who we share our data with	To provide league tennis services to you or process your request, we may share your personal data: <ul style="list-style-type: none"><li>• Organisation employees, volunteers etc. as applicable for the interaction</li><li>• To any governing bodies or regional bodies for our sport: to allow them to properly administer the sports on a local, regional, national and international level. These include Tennis Ireland.</li><li>• The government: where we are required to do so by law or to assist with their investigations or initiatives. These include Revenue Commissioners.</li><li>• Gardaí: to assist with the investigation and prevention of crime.</li></ul> With our selected third parties including certain service providers we have retained in connection with the services we provide;

<p>Children</p>	<p>Children should not directly provide any personal information (including name, email address, phone number or any other information that others could contact them directly). These players should be registered by a club official (adult), by them gathering the information in an appropriate manner - evidence of which should be retained locally in the club.</p> <p>The DLTC does not knowingly directly collect personal information from anyone under the age of 18 or knowingly allow such persons to register directly for any of our services.</p> <p>An individual may exercise their rights with respect to the use of their personal information (See "Your Rights" section)In the event that the DLTC learns that personal information has been collected without verification of parental consent, the information will be deleted as soon as possible.</p>
<p>Retention</p>	<p>We will only retain your personal data for as long as necessary to fulfil the purposes for which we collected it, including for the purposes of satisfying any regulatory, accounting, or reporting requirements.</p> <p>The applicable retention period for each category of data is set out in the sections below.</p> <p>Upon expiry of the applicable retention period we will securely return it to our clients if requested, however, normally we destroy your personal data in accordance with applicable laws and regulations.</p>
<p>Your Rights</p>	<p>You have various rights with respect to the use of your personal data:</p> <ul style="list-style-type: none"> <li>• <b>Informed:</b> You have the right to be informed when your personal data is being used</li> <li>• <b>Access:</b> You have the right to request a copy of the personal data that we hold about you. There are exceptions to this right, so that access may be denied if, for example, making the information available to you would reveal personal data about another person, or if we are legally prevented from disclosing such information. If you wish to do this, please contact us using the contact details provided below.</li> <li>• <b>Accuracy:</b> We aim to keep your personal data accurate, current, and complete. We encourage you to contact us by emailing us at the contact details provided below to let us know if any of your personal data is not accurate or changes, so that we can keep your personal data up to date.</li> <li>• <b>Objecting:</b> In certain circumstances, you also have the right to object to our processing of your personal data and to ask us to block, erase and restrict your personal data. If you would like us to stop using your personal data, please contact us by emailing us at the contact details provided below.</li> <li>• <b>Porting:</b> You have the right to request that some of your personal data is provided to you, or to another data controller, in a commonly used, machine-readable format.</li> <li>• <b>Erasure:</b> You have the right to erase your personal data when the personal data is no longer necessary for the purposes for which it was collected, or when, among other things, your personal data have been unlawfully processed. This right is limited to certain circumstances.</li> </ul> <p>Whilst this privacy policy 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 Irish Data Protection Commission's website at <a href="http://www.dataprotection.ie">www.dataprotection.ie</a>.</p> <p>To exercise any of the above rights, or if you have any questions relating to your rights, you may contact us by using the details set out in the "Contact Us" section below.</p>

<p>Our approach to Security</p>	<p><b>Approach</b></p> <p>We endeavour to use appropriate technical and physical security measures to protect your personal data which is transmitted, stored or otherwise processed by us, from accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access. Our service providers are also selected carefully and required to use appropriate protective measures.</p> <p>When you contact us to ask about your information, we may ask you to identify yourself. This is to help protect your information.</p> <p><b>Limitations</b></p> <p>As effective as modern security practices are, no physical or electronic security system is entirely secure. No data transmission over the Internet can be guaranteed to be 100% secure or confidential. Although we will do our best to protect your data, we cannot guarantee the security or confidentiality of your data transmitted to our site. Any transmission of data is at your own risk. Once we receive your data, we will use appropriate security measures to seek to prevent unauthorised access. We will continue to revise policies and implement additional security features as new technologies become available.</p> <p>In the unlikely event that there is an interception or unauthorised access to your personal data, we will not be liable or responsible for any resulting misuse of your personal information.</p> <p><b>Safeguards</b></p> <p>The DLTC uses a variety of safeguards, personnel and processes that form defence in depth barriers to protect your data. Some of these safeguards we use are firewalls and information access controls. We continuously evaluate our security posture to further enhance the security and confidentiality of your data.</p> <p>We have also put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.</p>
<p>Social Media</p>	<p>The DLTC does not have or operate social media accounts on any platform/service at this time.</p>
<p>CCTV</p>	<p>The organisation’s main office location is based on a sports facility. CCTV systems are provided and managed by David Lloyd. They are in place for the purpose of crime prevention, and public safety.</p> <p>We align with their CCTV policy and the terms of service in our tenancy contract.</p>
<p>Maintaining this Privacy Policy</p>	<p>We will make changes to this policy from time to time, particularly when we change how we use your information, and/or change our technology and services.</p> <p>You can always find an up-to-date version of this policy on our website</p>

Links to other websites from ours	<p>Our website/app may contain links, banners or advertisements to other websites. When you click on such links, banners or advertisements, the privacy policy of the websites/apps to which you are linked to will govern the use of your information collected on such sites/apps. The DLTC does not have access to or control over any technologies or practices that may be used by a third party.</p> <p>This privacy policy applies solely to the information collected by the DLTC. We encourage our users to read the privacy statement of each and every website after leaving our website through such links/banners to establish how such third-party organisations use your information.</p>
Disclosures	<p>We may disclose information about you to any of our employees, officers, as reasonably necessary for the purposes as set out in this privacy policy.</p> <p>In addition, we may disclose your personal information:</p> <ul style="list-style-type: none"> <li>(a) To the extent that we are required to do so by law;</li> <li>(b) In connection with any legal proceedings or prospective legal proceedings;</li> <li>(c) In order to establish, exercise or defend our legal rights</li> <li>(d) In connection with the successful provision of league tennis services</li> </ul> <p>Except as provided in this privacy policy, we will not provide your information to third parties.</p>
Right to register a Complaint	<p>If you have a complaint about the use of your personal information, please let us know, giving us the opportunity to put things right as quickly as possible. We are here to help and encourage you to contact us to resolve your complaint first.</p> <p>If you wish to make a complaint you may do so in in writing and by email. Please be assured that all complaints received will be fully investigated. You can register a complaint with the Data Protection Coordinator using the contact details below.</p> <p>We ask that you supply as much information as possible to help us resolve your complaint quickly.</p> <p>You can also contact the Irish DPC at <a href="http://www.dataprotection.ie">www.dataprotection.ie</a></p>
Policy Amendments	<p>We keep our privacy policy under regular review and will place any updates on our website. This privacy policy was last updated on 12/10/2022</p>
Contact Us	<p>In the event of any query or complaint in connection with the information we hold about you, please email <a href="mailto:dataprotectiondltc@gmail.com">dataprotectiondltc@gmail.com</a></p> <p>Or write to:</p> <p>Data Protection Coordinator  Dublin Lawn Tennis Council,  David Lloyd,  Riverview Beech Hill,  Clonskeagh,  Dublin 4</p>

## Categories of Data Subjects

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

Purpose	How we collect the data	Personal data used	Lawful basis	Retention Period
<b>Players</b>				
To provide the tennis league services. This information will only be used for the purposes of running the competition except where required by law to do so, be provided to any third party.	Email, website, phone or in writing.	Name, email, phone number, gender and date of birth.	Consent (as gathered and recorded by the participating clubs)	730 days post league playing or until unsubscribed  Historical results data (club vs club, match results) are kept for historical purposes for an infinite period of time.
<b>Employees</b>				
To manage your employment with the organisation for the duration of your engagement.	Application and commencement process	Name, address, contact details, PPSN number,	In order to process your employment contract. (Performance of a contract)	Duration of employment plus 7 years
<b>Committee Members, Post Holders, Volunteers, Officials</b>				
To assist in the coordination and organisation of meetings and events where volunteers, committees are involved.	Upon application	Name and contact details	To process communications relating to events and meetings (Consent)	For the duration of the volunteering period/committee membership. Reduced details may be maintained for historical record purposes
<b>Website Visitors</b>				
Details are provided in our Cookie Policy available on our website.	N/A	N/A	N/A	N/A

**Notes:**

For some of your personal information you will have a legal, contractual or other requirement or obligation for you to provide it to us. If you do not provide us with the requested personal information, we may not be able to provide our service or we may not be able to properly perform our contract with you or comply with legal obligations. 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.

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.