



# GDPR AND DATA PRIVACY POLICY

For the purposes of the General Data Protection Regulation ("GDPR") and Maltese data protection laws, the controller is the Rinella Tennis Club ('RTC'), Rinella Bay, Kalkara. RTC is registered with SportMalta C188.

This privacy policy sets out the way we process your personal data and we've created this privacy policy to make sure you are aware of how we use your data as a member of our tennis club.

Collecting specific, relevant personal information is a necessary part of RTC being able to provide you with any services you may request from us or just managing RTC's relationship with you.

The RTC reserves the right to amend this GDPR & Data Privacy Policy from time to time without prior notice.

## HOW WE COLLECT YOUR INFORMATION

We may collect your personal data in a few limited ways, namely:

- Directly from you, when you fill in an application for membership, when you make enquiries on our website, when you provide information via the jotform website or court booking system, or when you interact with us during your time as a member in various other ways (for example, when you enter a tournament, renew your membership, sign up for tennis coaching lessons and sign up for our annual tennis tour or christmas event);
- From someone else who has applied for membership on your behalf (for example a family member who has applied for a family membership & provided us with your contact details for that purpose);

## **THE TYPES OF INFORMATION WE COLLECT**

We may collect the following types of personal data about you:

- Contact and communications information, including your contact details (including email address(es), telephone numbers and residential address(es) and records of communications and interactions we have had with you) – Data is used to communicate with you.
- Gender, Date of Birth, Passport and/or Identity card details; - Data is used for addressing in emails, organising events that are age or gender specific (e.g ladies social tournaments), to determine tennis classifications (junior/adults) and/or for the purpose of booking flights when you apply for our annual summer tennis tour.
- Bank Account Details – if you have asked us to process a refund to your bank account.
- Certain other information which you volunteer when making use of your membership benefits (for example, when attending trophy nights or making court bookings);
- Photos and videos that are taken from CCTV cameras (to ensure security of premises & prevent crime) and during social events / tournaments.

## **OUR BASIS FOR PROCESSING PERSONAL DATA AND THE PURPOSES FOR WHICH WE USE IT**

- Performance of a contract. In order for RTC to offer you the relevant services following your enrolment as a member of the RTC.
- Pursuit of legitimate interests. In some cases, we may use your personal information to pursue legitimate interests of our own e.g. research & statistical analysis
- Consent. RTC may also process your personal data on the basis of consent you give on enrolment or at renewal stage.

- Compliance with our legal obligations. In some cases, RTC needs to process your personal data in order to comply with its legal obligations. For example, we need to process personal data in order to comply with health and safety legislation and assist with investigations by police and/or other competent authorities.

## **HOW WE USE YOUR PERSONAL DATA**

Personal data provided to us will be used for the purposes set out at the time of collection.

More generally, we will use your personal data for the following purposes:

- Administration of your RTC membership, including informing you about court/facilities, tennis tournaments, court opening hours and membership renewals;
- Fulfillment of orders for goods and services, including court bookings and the purchase of tennis equipment.
- Research and statistical analysis about who is playing tennis at our club or participating in RTC tournaments;
- Communications and updates about the RTC that we think may be of interest to you;
- Storing your details on the software platform we use for our membership database / court booking system;
- where this is necessary for our legitimate interests (for example in increasing use of our the RTC facilities and participation in the game generally);
- Promoting the RTC and promoting goods and services we offer (for example, tennis apparel and equipments, tennis courses etc.) where we think this will be of interest to you;
- Use on the Club's website, social media pages and press releases
- where this is necessary for our legitimate interests (or the legitimate interests of a third party), and/or where we have your consent, as applicable.

## HOW WE PROTECT YOUR PERSONAL DATA

- We will not transfer your personal data outside the EU without your consent.
- We have implemented generally accepted standards of technology and operational security in order to protect personal data from loss, misuse, or unauthorised alteration or destruction.
- Please note that when transmitting data to us over the internet, there is a risk that this may not be 100% secure, depending on your internet connection or personal computer software.
- Any payments taken from you online will be taken through a recognised online secure payment system.
- We will notify you as soon as possible after we are aware of it in the event of any breach of your personal data which might expose you to serious risk.

## YOUR PREFERENCES

We will always respect your wishes in respect of what type of communications you want to receive from us and how you want to receive them. There are some communications, however, that we need to send you regardless of your preferences in order for us to fulfil our contractual obligations to you as a member of the RTC. Examples of these essential service communications are:

- Membership related communication such as membership renewal reminders, notices of formal meetings and other social events, tennis tournaments applications and other general information emails e.g. RTC court unavailabilites.
- Records of transactions, such as paypal transactions / receipts (as applicable);

You are in control of how we communicate with you. You can update your choices and/or your contact details by contacting our club secretary:

Dr Andrew Stafrace  
Email: [rinellatennisclub@gmail.com](mailto:rinellatennisclub@gmail.com)

## **WITH WHOM DO WE SHARE THE PERSONAL DATA THAT WE HAVE COLLECTED ABOUT YOU?**

We do not sell or share your personal data for other organisations to use other than as set out below. This includes sponsorship partners who do not have access to the members' data.

Personal data collected and processed by us may be shared with the following third parties, where necessary:

- RTC Committee Members, RTC appointed coaches & volunteers, for the purposes of administering your membership and giving you access to the membership benefits to which you are entitled.
- Other members of the club or participants of RTC tournaments, where this is necessary for tournament purposes. In such cases, only your telephone / mobile details will be shared.

## **HOW LONG YOUR INFORMATION IS KEPT**

- We will process your personal data for as long as we need it to comply with our legal obligations, fulfil our contractual obligations towards you and/or pursue our legitimate interests. For most membership data, this means we retain it for so long as you have a valid membership and for a period of five years after your last interaction with us (for accounting, tax reporting and record-keeping purposes).

## **YOUR RIGHTS**

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

- Request access to your personal data, which 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 data (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.

## **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 legal rights, you may contact our Secretary which acts as the Data Protection Officer:

Dr Andrew Stafrace  
Email: [rinellatennisclub@gmail.com](mailto:rinellatennisclub@gmail.com)

If you are not satisfied with how we are processing your personal data, you can make a complaint to the Information and Data Protection Commissioner. You can find out more about your rights under applicable data protection laws from the Information and Data Protection Commissioner's Office website: <https://idpc.org.mt/en/Pages/Home.aspx>