

Fitzwilliam LTC Privacy Notice (website)

Last updated [19 September 2018]

1. INTRODUCTION

1.1 Fitzwilliam Lawn Tennis Club (FLTC) is committed to protecting and respecting your privacy. This Privacy Statement (together with our Privacy Notice, Privacy Policy, any terms and conditions or terms of use and any other documents referred to in it) applies to www.fltc.ie and the FLTC mobile application (the Service) and sets out the basis on which any personal data we collect from you, or that you provide to us, will be handled by us.

1.2 We fully respect your right to privacy in relation to your interactions with the Service and endeavour to guarantee to be transparent in our dealings with you as to what information we will collect and how we will use your information, and how we use and disclose personal data. This Privacy Statement tells you about the ways in which we protect your privacy and personal data we process about you.

2. INFORMATION WE MAY COLLECT FROM YOU

2.1 When you use the Service we may collect the following information from our registered users (Registered Users) that may, in certain circumstances, constitute personal data and/or sensitive personal data:

- 2.1.1** password;
- 2.1.2** name;
- 2.1.3** e-mail address;
- 2.1.4** phone number;
- 2.1.5** postal address;
- 2.1.6** date of birth;
- 2.1.7** gender; and
- 2.1.8** information about your sessions in the Service.

2.2 Moreover, if you contact us, a record of this correspondence may be kept.

2.3 The Service may automatically collect the following information from you which, in certain circumstances, may constitute personal data:

2.4 IP Addresses

An IP Address is a number that is assigned to your computer automatically when you use the internet. When you visit any web page on the Service our servers log your IP address. We may use your IP address to diagnose problems with our server and to administer the Service. Your IP address is also used to help identify you and to gather broad demographic information.

2.5 Cookies

A Cookie is a small file sent to your browser from a Web server and stored on your computer's hard drive to identify you as the user of the Service. Please see our Cookie Policy. You may choose to accept, refuse or delete all cookies at all times and this may affect how the Service works.

2.6 Analytics

The Service uses Google Analytics. Google Analytics collect standard log information and details of visitor patterns to improve the functioning of the Service. This information is only processed in a way that does not identify anyone as we have requested that Google Analytics anonymise the data collected. We do not make and do not allow Google to make any attempt to find out the identities of those visiting the Service. If we do collect personal identifiable information through the Service we will be upfront about it.

3. THE PURPOSES FOR WHICH WE USE THE DATA

3.1 We use the collected personal data for the following purposes:

- 3.1.1** to set up and maintain your registration with the Service;
- 3.1.2** to communicate with you;
- 3.1.3** to prevent and investigate fraud and other misuses;
- 3.1.4** to protect our rights and/or our property;
- 3.1.5** to operate and improve our products and services;
- 3.1.6** to allow members to update, show or hide their own data
- 3.1.7** to provide features available in the Service;
- 3.1.8** to develop, improve, and protect the Service;
- 3.1.9** for market research;
- 3.1.10** to audit and analyse the Service; and
- 3.1.11** to ensure the technical functionality and security of the Service.

3.2 We use the data collected automatically for the following purposes:

- 3.2.1** developing new products and services and improving our existing products and services;
- 3.2.2** maintaining our member database's accuracy and efficiency.

4. HOW WE DISCLOSE DATA

4.1 We do not sell, lease, rent or otherwise disclose the personal data relating to our Registered Users to third parties unless otherwise stated below.

4.2 The personal data collected in the Service may be disclosed in the following manner:

Personal data you provide to the Service:

4.2.1 We may disclose personal data you provide to the Service with the following categories of third parties:

- (a)** we may provide your email address and mobile phone number to other members of FLTC provided you have consented to this;
- (b)** to service providers, such as online payment service providers, which enable us to provide the Service to you; and
- (c)** to public authorities, such as law enforcement, if we are legally required to so or if we need to protect our rights or the rights of third parties.

Data collected automatically:

4.2.2 The data collected automatically in the Service may be disclosed to the following categories of third parties:

- (a)** To service providers, such as data analysis companies; and
- (b)** To public authorities, such as law enforcement, if we are legally required to do so or if we need to protect our rights or the rights of third.

4.3 Moreover, we may disclose information to third parties in an aggregate format that does not constitute personal data and does not allow the identification of individual Registered Users.

4.4 We will retain your personal information as needed to fulfil the purposes for which it was collected. We will retain your personal information no longer than is necessary to comply with our business and legal obligations.

5. DATA SECURITY

5.1 The security of personal data is important to us. We restrict access to personal data to employees, contractors and agents who need to know such personal data in order to operate, develop or improve the Service. We do our utmost to protect the privacy of Registered Users through the appropriate use of security technology. We ensure that we have appropriate physical and technological security measures to protect your information (the servers we use are secured and protected by a firewall); and we ensure that when we outsource any processes that the service provider has appropriate security measures.

5.2 Unfortunately, the transmission of information via the internet is not completely secure. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access. We are not responsible for any delays, delivery failures, or any other loss or damage resulting from (i) the transfer of data over communications networks and facilities, including the internet, or (ii) any delay or delivery failure on the part of any other service provider, and you acknowledge that the Service may be subject to limitations, delays and other problems inherent in the use of such communications facilities. Although we will do our best to protect personal data about you, we cannot guarantee the security of your data transmitted to the Service; any transmission is at your own risk.

5.3 Where we have given you (or where you have chosen) a password which enables you to access certain parts of the Service, you are responsible for keeping this password confidential. Please do not share your password with anyone.

5.4 No credit card data will be stored in our own systems.

6. YOUR RIGHTS

You have the following rights under the GDPR, in certain circumstances and subject to certain exemptions, in relation to your personal data:

- **Right to access the data:** you have the right to request a copy of the personal data that we hold about you, together with other information about our processing of that personal data.
- **Right to rectification:** you have the right to request that any inaccurate data that is held about you is corrected, or if we have incomplete information you may request that we update the information such that it is complete.
- **Right to erasure:** you have the right to request us to delete personal data that we hold about you. This is sometimes referred to as the right to be forgotten.
- **Right to restriction of processing or to object to processing:** you have the right to request that we no longer process your personal data for particular purposes, or to object to our processing of your personal data for particular purposes.
- **Right to data portability:** you have the right to request us to provide you, or a third party, with a copy of your personal data in a structured, commonly used machine-readable format.

- **Right to complain to the Data Protection Commissioner:** should be made in writing and addressed to:
- info@dataprotection.ie or The Data Protection Commissioner, Canal House, Station Road, Portarlington, Co. Laois.

In order to exercise any of the rights set out above, please contact us at admin@fltc.ie

If we are processing personal data based on your consent, you may withdraw that consent at any time. This does not affect the lawfulness of processing which took place prior to its withdrawal.

We do not use automated decision making or profiling.

7. HOW TO CONTACT US

FLTC is the controller of your data for the purposes of the GDPR.

If you have any questions about this Privacy Statement or any of the practices employed by FLTC, or your dealings with the Service, you may contact us at admin@fltc.ie or you can write to us using the address of: Fitzwilliam Lawn Tennis Club, Appian Way, Dublin 6, Ireland D06 X6X2.

8. LIMITATIONS

This privacy statement does not cover any links within this site linking to other websites. Where there is another website, you should ensure to read their privacy notice.

9. CHANGES

We may update this privacy policy from time to time. If we make changes, we will notify you prior to the changes taking effect by posting a notice on our websites and, where appropriate, sending you a notification.

9. GOVERNING LAW AND RESOLUTION OF DISPUTES

The laws of Ireland will govern this Privacy Statement and any claim, cause of action or dispute arising out of or relating to this Privacy Statement will be brought solely in the courts of Ireland. You hereby consent to the jurisdiction of and venue in such courts and waive any objection as to inconvenient forum.