

ST ALBANS AND HARPENDEN PICKLEBALLERS

Privacy Policy

Version	2.0
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Policy owner	Club Committee
Approved by	[INSERT APPROVING BODY OR COMMITTEE DATE]
Next review due	18/06/2027
Revisions made	Rewritten to reflect current safeguarding, data protection, equality, health and safety and sports club governance guidance.

1. Who we are

St Albans and Harpenden Pickleballers (SHARP Pickleball) is the controller for personal data used for club membership, bookings, communications, safeguarding, complaints, events and administration. Controller contact: [INSERT CLUB CONTACT EMAIL]. Postal contact, if used: [INSERT POSTAL CONTACT OR STATE EMAIL ONLY].

2. Purpose of this notice

This Privacy Policy explains what personal data the club collects, why it is used, the lawful basis for use, who it is shared with, how long it is kept and the rights people have under UK data protection law.

3. Who this notice applies to

This notice applies to members, former members, prospective members, waiting list applicants, guests, trial players, volunteers, committee members, coaches, parents, carers, website users, social media contacts and anyone who contacts or takes part in club activities.

4. Personal data we collect

- Name and contact details, including email address and phone number.
- Membership status, waiting list status, booking records, attendance records and session history.
- Payment records, subscription records and limited finance administration information.
- Emergency contact details where collected.
- Relevant health, injury, disability, accessibility or medical information where a person chooses to provide it or where it is needed for safety.
- Age or date of birth where needed for safeguarding, eligibility, session management or insurance.
- Communication records, including email, WhatsApp, social media messages and website enquiries.

- Photos, videos or social media content linked to club activities.
- Complaint, conduct, safeguarding, accident and incident records.
- Volunteer role information, training records, DBS status information where relevant, and role suitability information.

5. How we collect personal data

Personal data may be collected through membership forms, booking systems, waiting list forms, email, WhatsApp, social media, website forms, payment records, event registers, accident reports, safeguarding reports, complaints, volunteer records and direct communication with the club.

6. Why we use personal data and lawful basis

Purpose	Examples of data used	Lawful basis
Membership and club administration	Name, contact details, membership status, booking records	Contract, legitimate interests
Session bookings and attendance	Bookings, attendance, payments, cancellations	Contract, legitimate interests
Club communications	Email, phone, WhatsApp details, membership status	Legitimate interests, consent where required
Payments and finance records	Payment references, fee records, subscription records	Contract, legal obligation, legitimate interests
Health, safety and emergency response	Incident details, emergency contacts, relevant health information	Vital interests, legitimate interests, explicit consent or legal obligation where applicable
Safeguarding and welfare	Concern records, relevant personal details, communications	Legal obligation, legitimate interests, substantial public interest, vital interests or legal claims as applicable
Equality, accessibility and reasonable adjustments	Accessibility requests, relevant disability or health information	Explicit consent, legitimate interests, substantial public interest where applicable
Complaints and conduct matters	Complaint records, witness information, decisions	Legitimate interests, legal claims, legal obligation where applicable
Photos, videos and promotion	Images, video, name where used	Consent or legitimate interests depending on the context
Volunteer management	Role records, training, DBS status where needed	Legitimate interests, legal obligation, substantial public interest where applicable

7. Special category data and criminal offence data

Some information needs extra protection, such as health information, disability information, safeguarding information and DBS or criminal offence information. The club will only use this information where a UK GDPR lawful basis and an additional condition applies, such as explicit consent, vital interests, safeguarding of children and individuals at risk, substantial public interest, employment or volunteer safeguarding obligations, legal claims, or another lawful condition.

8. Who we share personal data with

The club will share personal data only where needed and proportionate. This may include committee members, session leads, volunteers, coaches, booking or membership system providers, email providers, website providers, WhatsApp or social media platforms, payment providers, venues, insurers, Pickleball England, safeguarding bodies, police, Children's Social Care, Adult Social Care, the Local Authority Designated Officer, legal advisers, accountants or regulators. The club will not sell personal data.

9. Processors and third-party platforms

The club may use third-party systems to manage membership, bookings, payments, email, documents, website content, social media and communications. Examples include [INSERT BOOKING SYSTEM, SUCH AS TEAMO], email providers, cloud storage, website hosting, WhatsApp, Facebook and Instagram. These organisations process data under their own terms and privacy arrangements. The club will use suitable systems and restrict access where practical.

10. International transfers

Some providers used by the club may process personal data outside the UK. Where this happens, the club will rely on appropriate safeguards used by the provider, such as adequacy regulations, standard contractual clauses or other lawful transfer mechanisms where required.

11. How long we keep personal data

Type of record	Typical retention approach
Membership and contact records	Kept while membership or waiting list relationship continues, then reviewed and deleted or archived when no longer needed.
Finance and payment records	Normally kept for up to 6 years where needed for accounting, tax, audit or legal reasons.
Booking and attendance records	Kept for as long as needed for club administration, safety, dispute handling and insurance reasons.
Accident and incident records	Kept for as long as needed for safety review, insurance, legal claims and regulatory reasons.
Safeguarding records	Kept securely for as long as required by safeguarding, legal, insurance, Pickleball

	England or statutory guidance. These records are not deleted simply because a person leaves the club.
Complaint and conduct records	Kept for as long as needed to manage the complaint, identify patterns, protect the club and respond to legal or insurance issues.
Photos and videos	Reviewed periodically and removed where no longer appropriate or where consent is withdrawn and no other lawful basis applies.
Volunteer records	Kept while the person volunteers and then retained only for as long as needed for safeguarding, insurance, legal or governance reasons.

12. Security

The club will take reasonable steps to keep personal data secure. This includes limiting access to people who need it, using password protection where practical, keeping paper records secure, avoiding unnecessary sharing, using suitable systems and deleting data safely when it is no longer needed.

13. Data breaches

A personal data breach means personal data has been lost, accessed, changed, disclosed or destroyed without permission. Any suspected breach should be reported to [INSERT DATA PROTECTION CONTACT] immediately. The club will assess the risk, take action to reduce harm and report to the Information Commissioner's Office or affected people where legally required.

14. Your rights

People have rights under data protection law, including the right to access personal data, ask for correction, ask for erasure, restrict processing, object to processing, receive data portability in some cases, withdraw consent where consent is the lawful basis, and complain to the Information Commissioner's Office. These rights are not absolute and depend on the circumstances.

15. How to make a data request

To make a data protection request, contact [INSERT DATA PROTECTION CONTACT EMAIL]. The club may need to confirm identity before responding. The club will normally respond within one month unless the request is complex or the law allows more time.

16. Complaints

People should contact the club first if they have concerns about how their personal data has been used. They also have the right to complain to the Information Commissioner's Office at ico.org.uk.

17. Website cookies

If the club website uses cookies, analytics, embedded content, forms or social media plug-ins, the website should include a cookie notice explaining what is used and why. If the website does not use non-essential cookies, the club should still check this periodically when website features change.

18. Review

This policy will be reviewed at least annually and sooner if the law, ICO guidance, club systems, website tools, booking systems or club activities change.

Guidance considered

This policy has been drafted with reference to UK GDPR, the Data Protection Act 2018, Information Commissioner's Office privacy notice guidance, sports club administration practice and safeguarding record principles.