



General Data Protection Regulation (GDPR) - Privacy Policy Notice

**Data controller: Silverleys Polo Club
Bury Green, Bishops Stortford,
Herts.
SG11 2ED**

Silverleys Polo Club (SLPC) collects and processes personal data relating to its clients in order to manage the relationship. SLPC is committed to being transparent about how it collects and uses that data and to meeting its data protection obligations.

What information does SLPC collect?

SLPC collects and processes the following information:

- Your name, address, and contact details including your email address
- Details pertaining to membership
- Bank details for payment
- Emergency contact
- Medical details
- CCTV footage and pictures

SLPC collect this information direct from you and via the HPA. For the HPA privacy policy please go to www.hpa-polo.co.uk.

We do not use any other third party to collect or process information on our behalf.

Why do we collect this data?

SLPC needs to process data to enter into contracts with you and to meet its obligations under such contracts.

In some cases, SLPC needs to process data to ensure that we are complying with our legal obligations. For example, we are required to process medical data to ensure we comply with health and safety and do not put your health at risk through participation.

In other cases, we have a legitimate interest in processing personal data before, during, and after your contract with SLPC. Processing client data allows us to:

- confirm bookings and rearrange lessons and to follow up with you regarding your experience with us
- maintain accurate and up-to-date client records and contact details, including emergency contacts
- maintain correct invoicing and payments
- assess client safety and suitability regarding playing and instruction

Processing employee data allows us to:

- maintain accurate and up-to-date records and contact details, including emergency contacts
- maintain correct invoicing and payments
- assess safety and fitness to work

For our members

SLPC need to process personal data such as name, contact details and address to form a contract between you as the member and the polo club. In order to carry out our obligations under this contract and notify or invoice you regarding our services we need to process personal data such as email address and/or address.

In some cases, we may be required to share personal information with the HPA, i.e. change in handicap or if you register your HPA membership with SLPC.

For our non-members

SLPC need to process your personal data to contact you regarding lesson bookings and to follow up on your time with us.

For job applicants and current/past employees

SLPC is the data controller for the application process unless otherwise stated.

All the information you provide during the process will only be used for the purpose of progressing your application or to fulfil legal or regulatory requirements.

The contact details you provide will be used to contact you to progress your application. We use other information that you provide to assess your suitability for the position.

We do not collect more information than we need to fulfil our stated purposes.

We are required to confirm the identity of our staff, their right to work in the United Kingdom and seek assurance as to their trustworthiness, integrity and reliability.

You will therefore be required to provide: -Proof of your identity – you will be asked to attend our office with original documents, we will take copies. -We will contact your referees, using the details you provide in your application, directly to obtain references

We will also ask you to complete a form about your health and previous experiences. This is to establish your fitness to work.

If we make a job offer, we will also ask you for the following: Bank details – to process salary payments
Emergency contact details – so we know who to contact in case you have an emergency at work
Medical details – if you have a medical condition that could impact you during work, you must disclose this.

For all staff we will retain the information you provide as part of your employee file for the duration of your employment. We may also keep your Personal Information for a number of years after the end of your employment.

Unsuccessful applicants: we may retain your information in order to contact you, should an opportunity become available after the original job has been filled.

Who has access to this data?

Your information may be shared internally within the management team. Providing access to your data is necessary for performance of their roles.

The organisation may share your data with third parties for two possible reasons;

- If required by the HPA or other polo organisation with regard to the management of the sport.
- If required by medical staff following an accident, for example, your name, age, and any pre-existing medical conditions

SLPC may also share your information with government authorities for legitimate purposes.

How long do we keep your data?

We will keep Personal Information for as long as is necessary for the purposes for which we collect it. The precise period will depend on the purpose for which we hold your information. In addition, there are laws and regulations that apply to us which set minimum periods for retention of Personal Information.

Depending on our relationship with you, we may keep your Personal Information for a number of years after our relationship ends.

We will provide you with further information if appropriate to give you a full picture of how we collect and use your Personal Information.

Marketing Purposes

SLPC will never send marketing information that does not relate directly to services that we provide.

We will send out regular information on events and services happening at Druids Lodge. We may also send out marketing on behalf of events that we are directly involved in or feel our clients will have a genuine interest in, for example, international polo events.

Pictures and Images

SLPC often have photographers present at fixtures and events who may take photos of players and the crowd which we use for marketing and business purposes.

We will always treat all images of our clients as sensitive data and will not sell your images on to third parties without your permission.

If you have any concerns about this, please contact us using the details below.

CCTV on the Premises

SLPC may operate 24 hour closed circuit television on the car park for safety and to protect its residents, clients, and visitors on the site.

These system will be encrypted at two separate levels so only those within senior management and the Premises Manager have access to the footage.

Footage will be stored on the built-in memory for a maximum of 120 days when it is automatically deleted.

Footage will only be downloaded from the system when it pertains to an incident that requires investigation internally or by the police. In these cases, only footage that is of the incident will be downloaded.

We will not use the CCTV system as a way of monitoring our residents, staff, clients, or visitors to the site.

SLPC will register our CCTV with the ICO as is required under the GDPR. This does not give the ICO access to the system.

Your Rights

As a data subject you have a number of rights which you can exercise in relation to the information we hold about you. This is under the Data Protection Act 1998.

You can read more about these rights here - <https://ico.org.uk/for-the-public/is-my-information-being-handled-correctly/>

If you would like to exercise any of these rights, please contact the address below.

Queries or complaints

If you have any queries regarding this privacy policy, or require any additional information or explanation, we will be more than happy to help. Please send any requests for this to the address below.

If you believe that SLPC has not complied with your data protection rights, you can complain to the Information Commissioner

How to Contact us

If you want to request information you can email <mailto:admin@silverleypolo.com>

or write to:

Data Protection Coordinator Silverleys Polo Club The Old Rectory, Church Lane, Much Hadham, Herts SG10 6DH

Date updated: 27/04/18

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