

# Privacy policy

## 1. Introduction

- 1.1 We are committed to safeguarding the privacy of our website visitors and service users.
- 1.2 This policy applies where we are acting as a data controller with respect to the personal data of our website visitors and service users; in other words, where we determine the purposes and means of the processing of that personal data.
- 1.3 We use cookies on our website. Insofar as those cookies are not strictly necessary for the provision of our website and services, we will ask you to consent to our use of cookies when you first visit our website.
- 1.4 Our website does not incorporate privacy controls which affect how we will process your personal data. The cookie data we store is merely to help us to see which pages and what information you find useful. We do not track IP addresses and we do not store any personal data in our database.
- 1.5 In this policy, "we", "us" and "our" refer to Warwickshire Squash. For more information about us, see Section 13.

## 2. Credit

- 2.1 This document was created using a template from SEQ Legal (<https://seqlegal.com>).

## 3. How we use your personal data

- 3.1 In this Section 3 we have set out:
  - (a) the general categories of personal data that we may process;
  - (b) in the case of personal data that we did not obtain directly from you, the source and specific categories of that data;
  - (c) the purposes for which we may process personal data; and
  - (d) the legal bases of the processing.
- 3.2 We may process data about your use of our website and services ("usage data"). The usage data may include your IP address, geographical location, browser type and version, operating system, referral source, length of visit, page views and website navigation paths, as well as information about the timing, frequency and pattern of your service use. The source of the usage data is CLICKY Web Analytics (<https://clicky.com>). This usage data may be processed for the purposes of analysing the use of the website and services. The legal basis for this processing is our legitimate interests, namely monitoring and improving our website and services.
- 3.3 We may process "enquiry data" (information contained in any enquiry you submit to us regarding goods and/or services). The enquiry data may be processed for the purposes of responding to your enquiry. The legal basis for this processing is your submission of this data and enquiry.
- 3.4 We may process "correspondence data" (information contained in or relating to any communication that you send to us). The correspondence data may include the communication content and metadata associated with the communication. Our website will generate the metadata associated with communications made using the website contact forms. The correspondence data may be processed for the purposes of communicating with you and record-keeping. The legal basis for this processing is our legitimate interests,

namely the proper administration of our website and business and communications with users.

3.5 We do not create or store "service data".

3.6 We do not create or store "publication data".

3.7 We do not request or store "account data".

3.8 We do not create or store "customer relationship data".

3.9 We do not create or store "transaction data".

3.10 We do not create or store "notification data".

3.11 We do not create or store "profile data".

3.12 We may process (any of your personal data identified in this policy) where necessary for the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure. The legal basis for this processing is our legitimate interests, namely the protection and assertion of our legal rights, your legal rights and the legal rights of others.

3.14 We may process any of your personal data identified in this policy where necessary for the purposes of obtaining or maintaining insurance coverage, managing risks, or obtaining professional advice. The legal basis for this processing is our legitimate interests, namely the proper protection of our business against risks.

3.15 In addition to the specific purposes for which we may process your personal data set out in this Section 3, we may also process any of your personal data where such processing is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.

3.16 Please do not supply any other person's personal data to us, unless we prompt you to do so.

#### 4. Providing your personal data to others

4.1 We do not provide your personal data to anyone outside the organisation.

#### 5. International transfers of your personal data

5.1 As per section 4.1

#### 6. Retaining and deleting personal data

6.1 This Section 6 sets out our data retention policies and procedure, which are designed to help ensure that we comply with our legal obligations in relation to the retention and deletion of personal data.

6.2 Personal data that we process for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.

6.3 Notwithstanding the other provisions of this Section 6, we may retain your personal data where such retention is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.

#### 7. Amendments

7.1 We may update this policy from time to time by publishing a new version on our website.

7.2 You should check this page occasionally to ensure you are happy with any changes to this policy.

## 8. Your rights

8.1 In this Section 8, we have summarised the rights that you have under data protection law. Some of the rights are complex, and not all of the details have been included in our summaries. Accordingly, you should read the relevant laws and guidance from the regulatory authorities for a full explanation of these rights.

8.2 Your principal rights under data protection law are:

- (a) the right to access;
- (b) the right to rectification;
- (c) the right to erasure;
- (d) the right to restrict processing;
- (e) the right to object to processing;
- (f) the right to data portability;
- (g) the right to complain to a supervisory authority; and
- (h) the right to withdraw consent.

8.3 You have the right to confirmation as to whether or not we process your personal data. We can now state that we do not retain personal data and the only purpose we use any personal data provided, is for responding to any queries you have submitted via the contact form on the website.

8.4 You have the right to have any inaccurate personal data about you rectified and, taking into account the purposes of the processing, to have any incomplete personal data about you completed. As we do not store personal data, this is not relevant.

8.5 In some circumstances you have the right to the erasure of your personal data without undue delay. As we do not store personal data, this is not relevant.

8.6 In some circumstances you have the right to restrict the processing of your personal data. As we do not store personal data, this is not relevant.

8.7 You have the right to object to our processing of your personal data on grounds relating to your particular situation, but only to the extent that the legal basis for the processing is that the processing is necessary for: the performance of a task carried out in the public interest or in the exercise of any official authority vested in us; or the purposes of the legitimate interests pursued by us or by a third party. As we do not store personal data, this is not relevant.

8.8 You have the right to object to our processing of your personal data for direct marketing purposes (including profiling for direct marketing purposes). As we do not store personal data, this is not relevant.

8.9 You have the right to object to our processing of your personal data for scientific or historical research purposes or statistical purposes on grounds relating to your particular situation, unless the processing is necessary for the performance of a task carried out for reasons of public interest. As we do not store personal data, this is not relevant.

8.10 To the extent that the legal basis for our processing of your personal data is:

- (a) consent; or
- (b) that the processing is necessary for the performance of a contract to which you are party or in order to take steps at your request prior to entering into a contract, and such processing is carried out by automated means, you have the right to receive your personal data from us in a structured, commonly used and machine-readable format. However, this right does not apply where it would adversely affect the rights and freedoms of others. As we do not store personal data, this is not relevant.

8.11 If you consider that our processing of your personal information infringes data protection laws, you have a legal right to lodge a complaint with a supervisory authority responsible for data protection. You may do so in the EU member state of your habitual residence, your place of work or the place of the alleged infringement. As we do not store personal data, this is not relevant.

8.12 To the extent that the legal basis for our processing of your personal information is consent, you have the right to withdraw that consent at any time. Withdrawal will not affect the lawfulness of processing before the withdrawal.

8.13 You may exercise any of your rights in relation to your personal data by written notice to us. As we do not store personal data, this is not relevant.

## 9. About cookies

9.1 A cookie is a file containing an identifier (a string of letters and numbers) that is sent by a web server to a web browser and is stored by the browser. The identifier is then sent back to the server each time the browser requests a page from the server.

9.2 Cookies may be either "persistent" cookies or "session" cookies: a persistent cookie will be stored by a web browser and will remain valid until its set expiry date, unless deleted by the user before the expiry date; a session cookie, on the other hand, will expire at the end of the user session, when the web browser is closed.

9.3 Cookies do not typically contain any information that personally identifies a user, but personal information that we store about you may be linked to the information stored in and obtained from cookies.

## 10. Cookies that we use

10.1 We use cookies for the following purposes:

- (a) analysis - we use cookies to help us to analyse the use and performance of our website and services (cookies used for this purpose are: `_referrer_og` and `_utm_og` and `_custom_data` and `_jsuid` and `cluid`).
- (g) cookie consent - we use cookies to store your preferences in relation to the use of cookies more generally (cookies used for this purpose are: `viewed_cookie_policy`).

## 11. Cookies used by our service providers

11.1 Our service providers use cookies and those cookies may be stored on your computer when you visit our website.

11.2 We use Clicky to analyse the use of our website. Clicky gathers information about website use by means of cookies. The information gathered relating to our website is used to create reports about the use of our website. Google's privacy policy is available at: <https://clicky.com/terms/privacy>.

11.3 We use Shadow Support to host the website and forward data from the contact form to the relevant people in the organisation. This service uses cookies. You can view the privacy policy of this service provider at <http://www.shadowsupport.co.uk/index.html>

## 12. Managing cookies

12.1 Most browsers allow you to refuse to accept cookies and to delete cookies. The methods for doing so vary from browser to browser, and from version to version. You can however obtain up-to-date information about blocking and deleting cookies via these links:

- (a) <https://support.google.com/chrome/answer/95647?hl=en> (Chrome);
- (b) <https://support.mozilla.org/en-US/kb/enable-and-disable-cookies-website-preferences> (Firefox);
- (c) <http://www.opera.com/help/tutorials/security/cookies/> (Opera);
- (d) <https://support.microsoft.com/en-gb/help/17442/windows-internet-explorer-delete-manage-cookies> (Internet Explorer);
- (e) <https://support.apple.com/kb/PH21411> (Safari); and
- (f) <https://privacy.microsoft.com/en-us/windows-10-microsoft-edge-and-privacy> (Edge).

12.2 Blocking all cookies will have a negative impact upon the usability of many websites.

12.3 If you block cookies, you will not be able to use all the features on our website.

## 13. Our details

13.1 This website is owned and operated by Warwickshire Squash.

13.2 We are a non-profit organisation for the promotion & support of Squash and Squash 57 (Raketball) in the county of Warwickshire, UK.

13.3 Our principal place of business is a private address.

13.4 You can contact us by using our website contact form:  
<https://www.warwickshiresquash.org/contact-us>

## 14. Data protection officer

14.1 Our data protection officer's contact details are: Nigel Orrett.