

Privacy & Cookies Policy

We Do Tennis C.I.C. | Effective from February 2026

This notice explains how We Do Tennis C.I.C. uses personal information about players, parents and guardians, customers, website visitors, volunteers, job applicants and other people who contact or take part in our activities.

1. Who we are

We are **WE DO TENNIS C.I.C.**, a community interest company registered in England and Wales under company number **11457528**.

Our registered office and main contact address is 7 Stanley Jackson Way, Welton, Brough, East Yorkshire, HU15 1PS.

We are the controller of personal information we decide to collect and use in connection with our coaching, programmes, bookings, communications and website. In some activities we may work with a host club, venue, local authority, school or delivery partner. Section 7 explains how responsibilities may be shared in those circumstances.

ICO registration number: **A8713866**.

Privacy contact: **Matt Whitaker**, Director

Email: matt@wedotennis.co.uk

2. Scope of this policy

This policy applies when you use www.wedotennis.co.uk, book or attend one of our activities, communicate with us by email, telephone, social media or in person, complete a form or survey, enter a competition, apply for a role, volunteer with us, or otherwise provide information to us.

Our activities are often delivered from tennis clubs and other venues operated by separate organisations. This policy explains when information may be shared with those organisations. A host organisation's own privacy notice may also apply where it decides how it will use information as a separate controller.

3. Information we collect

Depending on how you interact with us, we may collect:

- **Identity information** - name, title, username, date of birth, age group, gender and photographs or video.
- **Contact information** - postal address, email address, telephone number, and parent or guardian details where relevant.
- **Booking and participation information** - chosen venue, programme or session, dates attended, playing level, preferences, waiting-list information and communications about a booking.
- **Payment and transaction information** - payment status, refunds, purchase history and limited payment information. Full card details are normally processed by our payment provider rather than stored by us.
- **Health, accessibility and incident information** - medical conditions, allergies, disabilities, access requirements, injuries, accident reports and information needed to respond safely to an emergency.
- **Safeguarding information** - concerns, reports, actions and relevant communications where this is necessary to protect a child or adult at risk.
- **Marketing information** - communication preferences, subscriptions and responses to campaigns.
- **Technical and usage information** - IP address, device and browser information, cookies, website activity, approximate location derived from an IP address, and security logs.
- **Feedback and content** - survey answers, reviews, correspondence, competition entries and social-media interactions.

- **Recruitment and workforce information** - applications, qualifications, references, right-to-work information and information relevant to safer recruitment.

4. How we obtain information

We usually obtain information directly from you or, for a child, from a parent or guardian. We may also receive information from a booking platform, coach, host venue, school, local authority, governing body, funding or delivery partner, payment provider, referee, publicly available source, or another person where this is lawful and appropriate.

If information is provided by someone other than the person it is about, the person providing it should make sure they are authorised to do so and, where appropriate, direct that person to this policy.

5. How and why we use information

We only use personal information where we have a lawful basis. The principal purposes and bases we expect to use are summarised below. More than one basis may apply, depending on the circumstances.

Purpose	Examples of information	Main lawful basis
Responding to enquiries and arranging trials or bookings	Identity, contact and booking details	Steps before a contract; legitimate interests
Providing coaching, programmes, events and customer support	Identity, contact, booking, attendance and transaction details	Contract; legitimate interests
Taking payment, issuing refunds and maintaining accounts	Contact, payment and transaction details	Contract; legal obligation; legitimate interests
Managing venue access, registers, changes, cancellations and emergencies	Name, session, attendance and necessary contact details	Contract; legitimate interests; vital interests in an emergency
Health, accessibility, safety and incident management	Necessary health, access, accident or emergency information	Article 6 basis plus an Article 9 condition - usually explicit consent, vital interests, legal claims or safeguarding/substantial public interest where applicable
Safeguarding children and adults at risk	Identity, contact, incident and safeguarding information	Legal obligation; legitimate interests; vital interests; applicable Article 9/DPA 2018 condition
Service updates and marketing	Contact details, preferences and booking history	Contract for essential service messages; consent or legitimate interests for marketing, subject to PECR
Photography and video	Images, recordings and related consent records	Consent, unless another basis has been clearly explained
Improving services, surveys and reporting	Feedback, usage and appropriately aggregated participation data	Legitimate interests; consent where appropriate
Website operation, analytics, security and fraud prevention	Technical, usage and account information	Legitimate interests; consent for non-essential cookies where required
Complaints, disputes, insurance and legal compliance	Relevant account, correspondence, incident and transaction information	Legal obligation; legitimate interests; legal claims
Recruitment, volunteering and safer recruitment	Application, qualification, reference and vetting information	Steps before a contract; legal obligation; legitimate interests; consent where required

Legitimate interests

Where we rely on legitimate interests, those interests may include operating and improving our activities, administering bookings, maintaining accurate records, communicating with existing customers, protecting participants and staff, preventing misuse and establishing or defending legal claims. We consider whether the use is necessary and balance our interests against the person's rights and reasonable expectations.

Health and other special category information

Health information receives additional protection. We identify and document both an Article 6 lawful basis and an Article 9 condition before using it. We ask only for information that is genuinely relevant, restrict access and do not use health information for marketing.

6. Children and young people

Many of our activities involve children. We take particular care with children's information and collect only what is needed to administer and safely deliver the activity.

- A parent or person with parental responsibility will normally make the booking and provide contact, consent and relevant health information for a child.
- We may record the child's name, date of birth or age group, programme, attendance, playing information and relevant safety or safeguarding information.
- Where we communicate directly with a young person, we do so in an age-appropriate way and in accordance with our safeguarding arrangements.
- We provide clear information suitable for the child as well as information for the parent or guardian where appropriate.
- We do not share children's information with a host venue for that venue's own marketing without a separate, valid choice.

7. Host clubs, venues and delivery partners

Host tennis clubs and venues are separate organisations. We share only the information reasonably needed for the stated purpose, and not automatically every detail we hold.

Where a programme is delivered at a separately operated tennis club, school, leisure facility, park venue or other location, we may share limited personal information with that host or delivery partner where necessary to:

- administer and deliver the activity;
- manage registers, venue access, capacity, changes and cancellations;
- contact a participant or parent about the booked activity where this has been agreed;
- respond to an emergency or meet health, safety, accessibility, safeguarding or insurance requirements;
- handle a complaint or incident connected with the activity; or
- produce agreed participation reporting, preferably using anonymous or aggregated information where individual details are not required.

The information shared may include the participant's name, booked session, attendance, age group and necessary contact details. Relevant medical, accessibility or safeguarding information is shared only where necessary and lawful, with additional safeguards.

The identity of the host club or venue is normally clear from the booking page or programme information. Depending on the arrangement:

- the host may process information only on our instructions as a **processor**;
- we and the host may make separate decisions and act as **independent controllers**; or
- we may jointly decide the purposes and means and act as **joint controllers**.

We document the appropriate arrangement and responsibilities. Where a host acts as an independent controller, its own privacy notice applies to its use of the information. Where we act as joint controllers, we will make the essence of the joint arrangement available on request.

A host club or venue must not use information received from us for its own unrelated marketing unless the individual has been given a separate, clear choice and the marketing is otherwise lawful.

8. Other organisations we share information with

Where necessary and lawful, we may also share information with:

- coaches, activators, employees, volunteers and contractors who need it to perform their role;
- booking, payment, website, email, cloud storage, customer-management and other IT service providers;
- governing bodies, programme funders, local authorities and delivery partners, using anonymous or aggregated information where possible;
- insurers, accountants, auditors, legal advisers and other professional advisers;
- emergency services, safeguarding bodies, regulators, courts, law-enforcement agencies or public authorities where necessary or required; and
- another organisation in connection with a proposed restructuring or transfer of an activity, subject to appropriate confidentiality and data-protection safeguards.

We do not sell personal information. We do not give a third party personal information for its own marketing unless the individual has separately agreed or another lawful basis has been clearly explained.

9. Marketing communications

We may send information about relevant We Do Tennis activities where you have consented or where the law permits us to rely on legitimate interests. Electronic marketing is also handled in accordance with the Privacy and Electronic Communications Regulations (PECR).

You can opt out at any time by using the unsubscribe link in an email or by contacting matt@wedotennis.co.uk. We will action the request promptly. We may retain a minimal suppression record so that we do not contact you again inadvertently. Opting out of marketing does not stop essential messages about an existing booking.

10. Photographs and video

Where we rely on consent for identifiable photographs or video, you may withdraw that consent for future use. We will take reasonable steps to stop future use, but withdrawal cannot always remove material already printed, lawfully published or shared by others. We will explain the intended use when consent is requested.

11. Cookies and similar technologies

Cookies are small files placed on a device when a website is used. We may use:

- **strictly necessary cookies** for security, booking functions and core website operation;
- **functional cookies** to remember choices and improve features;
- **analytics cookies** to understand how the website is used; and
- **advertising or social-media cookies**, if used, to measure campaigns or enable third-party features.

Strictly necessary cookies do not require consent. We request consent before setting other cookies where the law requires it. You can change your choices through our cookie controls or browser settings. Blocking some cookies may affect website functions.

12. International transfers

Some service providers may store or access information outside the United Kingdom. Where this happens, we use an available legal mechanism, such as UK adequacy regulations or approved contractual safeguards, and assess whether additional protections are needed. Further information about relevant safeguards is available on request.

13. How we protect information

We use proportionate technical and organisational measures designed to protect personal information against unauthorised access, alteration, disclosure, loss or destruction. These include access controls, staff and contractor confidentiality, secure systems, supplier checks, data minimisation, backup and incident-management procedures.

No system is completely secure. If a personal-data breach occurs, we will assess it, take appropriate action and notify affected people and the ICO where the law requires.

14. How long we keep information

We keep information only for as long as reasonably necessary for the purpose for which it was collected, including legal, accounting, safeguarding, insurance and dispute-resolution requirements. Our retention decisions consider the type and sensitivity of the information and the risk from keeping it.

Typical periods include:

- booking, customer, payment and accounting records - normally up to six years after the relevant transaction or relationship, where needed for tax, accounting or legal claims;
- routine enquiries that do not lead to a booking - normally up to two years after the last meaningful contact;
- attendance, health and accessibility information - for the programme and a limited period afterwards, unless an incident, safeguarding, insurance or legal reason requires longer retention;
- accident and safeguarding records - for the period required by applicable law, guidance, insurers and our safeguarding retention arrangements;
- unsuccessful recruitment information - normally six months after the recruitment exercise unless a longer period is agreed or justified;
- marketing information - until you opt out or it is no longer needed, with a minimal suppression record retained where necessary; and
- photographs and video - for the stated use and review period, or until consent is withdrawn for future use where consent applies.

We may retain anonymous statistical information indefinitely because it no longer identifies an individual.

15. Your data-protection rights

Depending on the circumstances and lawful basis, you may have the right to:

- ask for access to personal information we hold about you;
- ask us to correct inaccurate or incomplete information;
- ask us to erase information;
- ask us to restrict how information is used;
- object to processing based on legitimate interests and object at any time to direct marketing;
- receive certain information in a portable format or ask us to transfer it;
- withdraw consent at any time, without affecting earlier lawful use; and
- complain to the Information Commissioner's Office.

These rights are not absolute and exemptions may apply. We may ask for information needed to verify identity. We do not currently use personal information to make solely automated decisions that produce legal or similarly significant effects.

16. Links and third-party services

Our website, booking pages and communications may link to services operated by other organisations. Their privacy and cookie notices apply to their own services. We encourage you to read those notices.

17. Questions and complaints

Please contact us first if you have a question, wish to exercise a right or are concerned about our use of personal information:

Matt Whitaker, Director

We Do Tennis C.I.C.

7 Stanley Jackson Way

Welton, Brough

East Yorkshire, HU15 1PS

matt@wedotennis.co.uk

We will acknowledge and handle data-protection complaints in accordance with applicable statutory requirements. Please provide enough detail for us to investigate. If you remain dissatisfied, you may complain to the Information Commissioner's Office at **www.ico.org.uk** or by calling **0303 123 1113**.

18. Changes to this policy

We review this policy regularly and update it when our services, sharing arrangements or the law change. The latest version will be published on our website. If a change materially affects how we use existing information, we will take reasonable steps to bring it to the attention of affected people before the new use begins.

Policy version: February 2026 | Document owner: Director, We Do Tennis C.I.C.