

WILL TO WIN PRIVACY POLICY

For the purposes of the General Data Protection Regulation ("GDPR") and UK data protection laws, the Controller is Will to Win.

About this document

This privacy policy sets out the way we process your personal data and we've created this privacy policy to make sure you are aware of how we use your data as a customer and/or Smartcard holder at our Sports Centres and Cafes.

How we collect your information

We may collect your personal data in a few limited ways, namely:

- Directly from you, when you fill in an application for our programme and/or Smartcard registration (online or offline), when you make enquiries on our website, sign up for our newsletter, when you provide information via the Centre's management software or court booking system, or when you interact with us during your time as a player/Smartcard holder in various other ways (for example, where you enter a competition, book an event at our Centre, sign up for a course or lessons, claim a discount at our cafe);
- From someone else who has applied for a Smartcard subscription on your behalf (for example, a family member or your coach who has provided us with your contact details for that purpose);
- From the LTA (for example, where the LTA passes on your details to us in connection with a complaint or query you have raised about our Company, or in relation to an LTA-sponsored event or programme).

The types of information we collect

We may collect the following types of personal data about you:

- Contact and communications information, including your contact details (including email address(es), telephone numbers and date of birth for junior attendees & Concession Smartcard holders, preferred sports centre(s), and records of communications and interactions we have had with you);
- Financial information, including credit card details are shared with our third-party payment service providers. These third parties may store your credit or debit card account information for your future use on our website, to the extent permitted by local law. Your CVV number will not be stored and must be re-entered for each order.
- Certain other information which you volunteer when making use of your Smartcard or other subscription/membership benefits (for example, when making court bookings or making use of other Centre's facilities).

We may also collect data about your health or medical conditions, where you have volunteered this, for example so that we can cater for you when you attend a Company's social event or a course/camp.

Cookies

A 'cookie' is a small text file that is placed on a user's computer hard drive by a website. The use of cookies is an industry standard, and many major websites use them to provide useful features for their customers.

- Will to Win typically uses both functional and performance cookies to make our website more useful by personalising information for visitors and by storing information about your preferences on our site. Functional cookies are necessary for the website to function and cannot be switched off without impairing the functioning of our website. Performance cookies allow us to measure & improve the performance of our website and provide enhanced functionality and personalisation.
- We use Google Analytics to better understand site traffic patterns and use to help analyse where visitors go and what they do whilst visiting our website.
- We also use cookies in our email communications to personalise emails and track whether the mail has been opened or read, and whether the recipient has used any website links contained in the email communication.



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- Most internet browsers are initially set up to accept cookies, but if you prefer, you can set your browser to reject cookies. Note that if you reject cookies, you may still use our site but may not be able to take full advantage of the website.

How we use personal data

Personal data provided to us will be used for the purposes set out at the time of collection and, where relevant, in accordance with any preferences you express. More generally, we will use your personal data for the following purposes:

- Administration of your Centre's Smartcard subscriptions, including:
 - informing you about court / facilities opening hours;
 - taking payment of subscription fees;
 - informing you about the offerings designed for Smartcard holders.
- Fulfilment of orders for goods and services, including court bookings;
- Administration of the Wimbledon Ballot; where this is necessary for the performance of a contract (including any written terms and conditions relating to your LTA membership) with you;
- Research and statistical analysis about who is playing sports in our Centres;
- Communication about Centre activities we believe may be of interest to you;

- Storing your details on software platforms used for the online management of our customer database and programme/court bookings. Please note that your own use of the software or system is subject to the Terms and Conditions and Privacy Policy published on that site;
- Where this is necessary for our legitimate interests (for example in increasing use of our facilities and participation in the game generally);
- To develop new products and services and to review and improve current products and services;
- Promoting our Centre and promoting goods and services of third parties (for example, equipment suppliers, operators of coaching courses, and organisers of sports events) in which we believe may be of interest to you;
- Where we have your consent, as applicable;
- Statistical analysis of demographic data to support applications for funding facility development and maintenance, and for reports required by our landlords;
- To tailor and offer personalised content and services to you;
- Safeguarding and protecting our players and other users of the facilities (e.g. disturbances, noise).

We may communicate with you by SMS, email, phone, post, and digital channels, including our website and social media channels (e.g. Facebook, Twitter, Instagram, WhatsApp).

Your marketing preferences

We will always respect your wishes in respect to the types of communications you want to receive from us. Please note that some communications, however, may be sent regardless of your marketing preferences in order for us to fulfil our contractual obligations to you as a player at our Centre(s). Examples of these essential service communications are:

- Records of transactions, such as payment receipts or payment confirmations (as applicable);
- Mailings affecting your access to our services and facilities, and information about important dates/events (e.g. rained off session, changes to our T&Cs and other relevant policies, centre closures and holiday opening hours);
- Smartcard subscription-related mailings, such as notices of failed recurring payments.

You are in control of how we communicate with you. You can update your choices and/or your contact details by going to www.willtowin.co.uk/privacy/

- by clicking on "update my preferences" link at the bottom of one of our newsletters;
- online by updating your account



- by email: privacy@willtowin.co.uk;
- or by post: Will to Win Regent's Park, York Bridge, Inner Circle, London NW1 4NU.

Sharing your information with others

We do not sell or share your personal data for other organisations to use other than as set out below. Personal data collected and processed by us may be shared with the following third parties, where necessary:

- Our employees, coaches and volunteers, for the purposes of administering your access to our services and offerings, and giving you access to the benefits to which you are entitled;
- Our contractors and suppliers for the administration of payment services, customer communication platforms, sports associations, data storage providers, any provider of Smartcard and facilities management services, and procurement of funding for our facilities;
- Our sports coaches.

How long your information is kept

We keep your personal data only as long as required for each purpose we use it. For most customer data, we retain this information for a period of six years after your last interaction with us (for accounting, tax reporting and record-keeping purposes).

Your rights

Under certain circumstances, by law you have the right to:

- Request access to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it;
- Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected;
- Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no valid reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have exercised your right to object to processing (see below).
- Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party), including the right to object where we are processing your personal data for direct marketing purposes.
- Request the restriction of processing of your personal data. This enables you to ask us to suspend the processing of personal data about you, for example if you want us to establish its accuracy or the reason for processing it. You can also withdraw your consent, where this is the basis for our processing your data (without affecting the lawfulness of our previous processing based on consent).
- Request the transfer of your personal data to another party.

Please note that the above rights are not absolute, and we may be entitled to refuse requests where exceptions apply.

Contact and complaints

If you have any queries about this privacy policy or how we process your personal data, or if you wish to exercise any of your legal rights, you may contact us:

- by email: privacy@willtowin.co.uk;
- or by post: Will to Win Regent's Park, York Bridge, Inner Circle, London NW1 4NU.

If you are not satisfied with how we are processing your personal data, you can make a complaint to the Information Commissioner. You can find out more about your rights under applicable data protection laws from the Information Commissioner's Office website: www.ico.org.uk.

CHANGES TO THIS POLICY

- We reserve the right to update this Policy to reflect changes to our information practices by prominently posting notice of the update on our website and as required, obtaining your consent.



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- Any updates will become effective immediately after posting the updates to this Policy and apply to all information collected about you, or where required, upon your consent.
- You agree that you will review this Policy periodically.
- You are free to decide whether or not to accept a modified version of this Policy, but accepting this Policy, as modified, is required for you to continue using our services. If you do not agree to the terms of this Policy or any modified version of this Policy, your sole recourse is to terminate your use of our services.

Full Terms & Conditions can be found at www.willtowin.co.uk/terms-and-conditions/. If you wish to update your personal details, please login to your Will to Win account at www.willtowin.co.uk/account/. To manage how Will to Win communicates with you, including any email subscriptions and marketing preferences, please visit www.willtowin.co.uk/preferences/.

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