



Squash Facilities Network

SQUASH FACILITIES NETWORK (SFN) PRIVACY POLICY

This policy sets out how the Squash Facilities Network, Markus Gaebel (registered number 02784600187 whose registered office is at Via Montebello della Battaglia 4, 27100 Pavia (PV), Italia) (“**SFN**”, “**we**”, “**us**” or “**our**”) collects and uses any personal data we collect or receive about you, why we collect and use your personal data, who we might share this information with and your rights in relation to your personal data.

We are committed to protecting and respecting your privacy and complying with our obligations under the General Data Protection Regulation (“**GDPR**”) and all other laws relevant to the handling of your personal data. We are the data controller for the purposes of GDPR.

When we refer to “personal data”, we are referring to any information which can directly or indirectly identify you, as explained more fully below.

WHAT PERSONAL DATA WE COLLECT ABOUT YOU (OR RECEIVE FROM THIRD PARTIES)

- ✓ **Information that you provide to us** – this may include any of the following types of personal data which you provide to us when you sign-up to be an SFN member, enquire about consulting, provide bank details for expense payments, or otherwise when you communicate or interact directly with us:
 - **Identity Data** – first name, last name, gender, username or other user identifier, date of birth, nationality;
 - **Contact Data** – your phone numbers, email address and postal address;
 - **Financial Data** – bank details and details of any transactions made with SFN; and
 - **Profile Data** – you may provide feedback to SFN through surveys or feedback forms and indicate your preferences to receiving marketing (from us or third parties).
- ✓ **Information that we collect about you** – when you visit the SFN website we automatically collect the following types of personal data, using cookies or other similar technologies:
 - **Technical Data** – this might include your IP address, account log-in information, browser information, location information, operating system and system configuration, network and software identification and device information; and
 - **Usage Data** – this includes information about how you use the European Squash Federation website, such as click throughs, time spent on page, download errors.

In addition to the above, please note that we may use and share aggregated data (such as demographic data). This may have originally generated from your personal data but is not treated as personal data under GDPR (as it doesn’t individually identify you). On such basis, we can use this data for any purpose. If this aggregated data is ever combined with other data in such a way that you can be personally identified, we will only use that data in accordance with this Privacy Policy.

WHY WE USE YOUR DATA

Set out in the table below are the purposes for using your personal data and the legal basis for doing so:

Purpose	Types of Data	Lawful basis
To register you as an ESF Member	Identity, Contact, Financial	Performance of a contract with you
For internal administration and record keeping purposes	All	Performance of a contract with you Necessary to comply with a legal obligation Necessary for our legitimate interests (for effective business administration and service revision)
To perform any services you have requested (such as providing you with the benefits of SFN membership or providing you with information you have asked for)	Identity, Contact, Financial	Performance of a contract with you
To notify you of changes to our Privacy Policy, our Terms and Conditions or other changes to our services or products	Identity, Contact	Performance of a contract with you Necessary to comply with a legal obligation
To answer your enquiries which may involve contacting you by post, e-mail or phone	Identity, Contact	Performance of a contract with you Necessary for our legitimate interests (to ensure our members and users are informed and satisfied with our service)
To promote squash events	Identity	Necessary for our legitimate interests (to improve attendance at events and develop our business generally)
To contact you about squash events, offers and opportunities available from SFN	Identity, Contact, Profile	Necessary for our legitimate interests
ensure that the website is delivered to you in the most effective way possible		user experience and inform our marketing strategy)
To verify your identity and detect fraud and security issues	All	Necessary for our legitimate interests (to prevent and detect fraudulent activity, security incidents and criminal activity)
To enable you to participate in prize competitions, prize draws or complete a survey	Identity, Contact, Profile, Technical, Usage	Necessary for our legitimate interests (to develop our business, promote new products and services, obtain feedback from customers and users to improve our services)

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.



Squash Facilities Network

HOW LONG DO WE KEEP YOUR DATA FOR?

We will keep your data for as long as you are a SFN member and/or where you are still happy to hear from us about our latest news, products and services. Once you no longer wish to be engaged with SFN we may still need to keep hold of your data if there is a legal reason for doing so (such as for tax purposes or where we need to resolve any disputes with you). In such circumstances, we will only retain the minimum amount of data necessary for such reason.

THIRD PARTY WEBSITE LINKS

Please note that the SFN website may include links to third party websites. If you choose to click through to the relevant third party's website, you will be subject to the terms and conditions of use and privacy policy of the relevant third party. SFN does not accept any responsibility or liability for these policies of your use of such third-party websites. Please check the terms of these policies before using the relevant third party's website.

DISCLOSURE OF YOUR PERSONAL INFORMATION

We may disclose your personal information for the following purposes:

We may disclose your personal information to clubs, coaches, tournament organisers, agents, sub-contractors, consultants and volunteers who will process it strictly on our behalf for the purposes set out above.

Where you have explicitly consented to us doing so, we may disclose your personal data to third parties for marketing purposes. You can opt-out of any marketing preferences at any time by following the process referred to below.

We may also be required to share your personal data with third parties if required by law or regulation. In such circumstances, we will make sure that the disclosure is only to the extent required by law or regulation.

If we share personal data with third parties, we will ensure that access is limited on a strictly need to know basis and is subject to suitable obligations relating to confidentiality and security.

WHERE WE STORE YOUR DATA

We will store your data on all over the world, including Europe and the US and will ensure that such data is held securely in accordance with good industry standards. Where we have given you a password to access a part of the SFN website you are responsible for keeping this password secure and confidential. Please do not share this with anyone else.

Please be aware that the transmission of data via the internet is not completely secure. Although SFN uses its best endeavours to keep your data secure, we cannot guarantee that information transmitted to us via the internet will be completely secure and any transmission is at your own risk.



Squash Facilities Network

CHANGES TO OUR PRIVACY POLICY

If we amend our Privacy Policy, it will be published on the SFN website so please check the website regularly to see if there have been any changes. We may also email you to notify you of any substantial changes to this Privacy Policy by email if appropriate.

YOUR RIGHTS

In certain situations, you are entitled to:

- access a copy of your personal data;
- correct your personal data;
- erase your personal data;
- object to the processing of your personal data where we are relying on a legitimate interest (as set out in the above table);
- restrict the processing of your personal data;
- request the transfer of your personal data to a third party; or
- where you have provided your consent to certain of our processing activities, in certain circumstances, you may withdraw your consent at any time (but please note that we may continue to process such personal data if we have legitimate legal grounds for doing so).

If you wish to exercise any of these rights, please contact us using the details set out in the “Contact Us” section below. You will not have to pay a fee to exercise any of these rights, unless your request is clearly unfounded, repetitive or excessive (in which case we can charge a reasonable fee). Alternatively, we may refuse to comply with your request in these circumstances.

In addition to the above, please note that you have the right to make a complaint at any time to the Information Commissioner’s Office if you are concerned about the way in which we are handling your personal data. <https://ico.org.uk/>

HOW TO OPT-OUT

You can opt-out of any third-party marketing that you have previously opted into (or any SFN marketing) either by contacting us using the details set out below in the “Contact Us” section.

CONTACT US

If at any time you wish to contact us, whether that is to exercise your rights or otherwise, please contact:

Email: team@squashfacilities.net