PHASE

TENNIS ACADEMY

Phase Tennis Academy Privacy Policy

Introduction

Phase Tennis Academy ("Phase", "we" or "us") is committed to protecting and respecting your privacy. We provide tennis coaching, training programmes and related services in Wales and online. This privacy policy explains how we collect, use, store and protect personal information about our clients and website visitors in accordance with the United Kingdom General Data Protection Regulation (UK GDPR), the Data Protection Act 2018 and other applicable laws. It applies to all personal data processed by Phase, whether via our website https://phasetennis.co.uk, booking systems, email, phone, WhatsApp, social media or in person.

Who we are

- **Data Controller:** Phase Tennis Academy, Cardiff, Wales, United Kingdom.

- **Contact:** You can contact us by email at coach@phasetennis.co.uk.

- **Data Protection Contact:** For privacy enquiries or to exercise your rights, please email coach@phasetennis.co.uk.

Personal data we collect

We collect and process the following categories of personal data when you contact us, use our website, book sessions or participate in our programmes:

- **Identity and contact data:** name, email address, phone number, postal address.

- **Player information:** age, date of birth, playing level, performance goals, video footage and notes from coaching sessions.

- **Health data:** information about injuries, medical conditions, allergies or other health information relevant to providing training and safeguarding.

- **Financial data:** payment details for processing fees (e.g. card or bank details via secure payment platforms) and transaction histories.

- **Technical data:** IP address, browser type/version, device identifiers, and usage data (e.g. pages visited, session times).

- **Communication data:** records of communications via email, WhatsApp, text, social media or telephone, including feedback and testimonials.

- **Marketing preferences:** your preferences in receiving marketing from us and your communication preferences.

How we collect data

- **Direct interactions:** When you submit an enquiry via our website, sign up for a coaching programme, attend sessions, contact us by phone or WhatsApp, complete online forms (e.g. consultations, booking requests) or meet us in person.

- **Automated technologies:** We automatically collect technical and usage data about your browsing actions and patterns through cookies and similar technologies when you interact with our website.

- **Third-party sources:** We may receive personal data from third-party services that facilitate bookings or payments (e.g. Calendly, Stripe), social media platforms (e.g. Facebook, Instagram) and analytics providers (e.g. Google Analytics).

Purposes and lawful bases for processing

We process your personal data only when we have a lawful basis to do so. The main purposes and corresponding lawful bases include:

- **Providing coaching services (contract):** To register you as a client, deliver coaching programmes, schedule sessions, adapt training to your needs and monitor progress. This is necessary for the performance of our contract with you.

- **Communications (legitimate interests/consent):** To respond to enquiries, confirm bookings, provide session updates and support, send newsletters and marketing communications. We rely on legitimate interests to communicate with existing clients about our services and obtain consent for marketing communications when required.

- **Health and safety (vital interests/legal obligation):** To record health or injury information and share relevant details with coaches and medical professionals if necessary to protect your well-being.

- **Payments and administration (contract/legal obligation):** To take and manage payments, process invoices, manage accounts and prevent fraud.

- **Website operation and analytics (legitimate interests):** To administer and protect our business and website (including troubleshooting, data analysis, testing, security, system maintenance and reporting) and to improve the user experience.

- **Compliance and legal requirements (legal obligation):** To comply with applicable laws, regulatory obligations and lawful requests from authorities.

Cookies and tracking technologies

Our website uses cookies and similar technologies to distinguish you from other users, remember your preferences and collect usage statistics. Some cookies are necessary for the website to function. Others (e.g. analytics cookies) require your consent. When you visit our site, you can choose which non-essential cookies to accept via the cookie banner. For more details, please refer to our Cookie Policy (to be published separately).

How we share personal data

We do not sell your personal data. We may share data with:

- **Coaches and staff:** to deliver training and manage bookings.
- **Service providers:** such as payment processors (e.g. Stripe), scheduling and calendar services (e.g. Calendly, Google Calendar), communications providers (e.g. WhatsApp), website hosting, cloud storage and analytics services. These providers act as processors and only use your data under our instructions.
- **Professional advisers:** including accountants, insurers, lawyers or other advisers when necessary for our business operations.
- **Regulators and authorities:** when required by law or to respond to legal processes.
- **Third-party social media platforms:** if you engage with our content on platforms such as Instagram or Facebook, your data may be processed by those platforms under their own privacy policies.

International transfers

Many of our service providers are based in the UK or European Economic Area (EEA). Where personal data is transferred outside the UK/EEA (e.g. when using cloud services hosted overseas), we ensure that appropriate safeguards are in place, such as standard contractual clauses or adequacy decisions, in accordance with UK GDPR.

Data retention

We retain personal data only for as long as necessary to fulfil the purposes we collected it for, including for legal, accounting or reporting requirements. We will securely delete or anonymise data when it is no longer needed. In general:

- **Client records (contact details, session notes):** kept for up to **7 years** after the last interaction to comply with legal obligations and exercise or defend legal claims.
- **Payment records:** retained in accordance with tax and accounting laws (usually **6 years**).

- **Marketing lists:** retained until you withdraw your consent or unsubscribe.
- **Video footage and performance notes:** retained for as long as necessary to provide coaching and performance analysis, then deleted or anonymised.

Data security

We implement appropriate technical and organisational measures to safeguard personal data, including:

- **Secure storage:** password-protected devices, encrypted cloud services and restricted access to client information.
- **Regular backups and updates:** we perform regular data backups and apply security updates to our systems.
- **Staff training:** all coaches and staff are trained on data protection and confidentiality.
- **Incident response:** we maintain an incident response plan to handle suspected breaches and will notify affected individuals and the ICO where appropriate.

Your rights

Under UK GDPR, you have the following rights regarding your personal data:

- **Right of access:** request a copy of the personal data we hold about you.
- **Right of rectification:** request correction of inaccurate or incomplete data.
- **Right to erasure:** ask us to delete your data where there is no good reason for us to continue processing it.
- **Right to restrict processing:** request restriction of processing in certain circumstances.
- **Right to object:** object to processing based on legitimate interests or to direct marketing.
- **Right to data portability:** request transfer of your personal data to another party in a structured, commonly used, machine-readable format (where processing is based on consent or contract).
- **Right to withdraw consent:** where we rely on consent, you can withdraw it at any time.

- **Right to complain:** you can lodge a complaint with the UK Information Commissioner's Office (ICO) at https://ico.org.uk if you believe your data has been mishandled.

To exercise any of these rights, please contact us using the details above. We will respond within one month. We may need to verify your identity before fulfilling your request.

Links to other websites

Our website and communications may include links to third-party sites (e.g. partner clubs, booking portals, social media). We are not responsible for the privacy practices of these sites. We encourage you to read the privacy statements of every website you visit.

Changes to this privacy policy

We may update this privacy policy from time to time to reflect changes in our practices or legal requirements. We will post any changes on our website and, where appropriate, notify you by email. The date of the latest revision will be indicated at the top of the policy.

Key responsibilities and actions for Phase

To ensure this privacy policy is meaningful and consistently applied, Phase Tennis Academy will:

1. **Inform clients:** Provide the privacy policy to clients at the point of data collection (e.g. in consultation forms, on the website, via email signatures).

2. **Collect minimal data:** Only collect information necessary for providing coaching and managing client relationships. Avoid recording sensitive details unless they are directly relevant and consented to.

3. **Keep records secure:** Use password protection, encryption and access controls on all devices and storage platforms that contain client data. Store paperwork in locked cabinets.

4. **Train staff:** Ensure coaches and assistants understand their privacy obligations, including confidentiality, secure communications and data minimisation.

5. **Obtain consent for marketing:** When sending promotional messages (e.g. newsletters, special offers) obtain opt-in consent and provide an easy way to opt out.

6. **Use secure communications:** Prefer encrypted channels (e.g. secure email, reputable messaging platforms) for sharing personal data. Avoid using personal social media accounts to discuss client information.

7. **Review regularly:** Review the privacy policy at least annually and update it when services, technology or laws change.

8. **Respond to requests:** Keep a log of data subject requests and respond promptly, respecting individuals' rights.

9. **Report breaches:** If a data breach is suspected, follow the incident response plan and report notifiable breaches to the ICO within 72 hours.

10. **Maintain cookie consent:** Ensure the website displays a clear cookie banner and provides choices to users about non-essential cookies.

By implementing these actions and maintaining this policy, Phase Tennis Academy demonstrates its commitment to protecting personal data and complying with UK data protection laws.