

# Privacy Policy

## 1. INTRODUCTION

Welcome to Sandbach Gymnastics' privacy notice.

Sandbach Gymnastics respects your privacy and is committed to protecting your personal data. This privacy notice will inform you as to how we look after your personal data when you visit our Gym or access our website (regardless of where you visit it from) and tell you about your privacy rights and how the law protects you. Please use the Glossary to understand the meaning of some of the terms used in this privacy notice.

## 2. IMPORTANT INFORMATION AND WHO WE ARE

### **Purpose of this privacy notice**

This privacy notice aims to give you information on how Sandbach Gymnastics collects and processes your personal data through your use of our Gym, including any data you may provide through this website or by telephone, mail or email when you enrol on one or more of our classes or squads, book a party or sign up to our newsletter, updates and special offers.

This privacy notice addresses all users of our Gym including all gymnasts, adults, pre-schoolers, those attending open play and those individuals with special needs.

It is important that you read this privacy notice together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy notice supplements the other notices and is not intended to override them.

### **Children**

Our website is not intended for children although we acknowledge that a significant proportion of Gym users will be children. Some users of our Gym may have special needs. We collect personal data about children (and/or those with special needs) and process it in accordance with the current legislation. Children and individuals with special needs must be represented by a parent or guardian and we will need parental/guardianship consent to hold such information about them. In these circumstances we will explain to the parent or guardian why we need such information and how it will be used. It is not intended that this privacy notice will be read by children.

### **Controller**

Sandbach Gymnastics Ltd is the controller and responsible for your personal data (collectively referred to as "Gym", "we", "us" or "our" in this privacy notice).

We have appointed a Data Privacy Manager who is responsible for overseeing questions in relation to this privacy notice. If you have any questions about this privacy notice, including

any requests to exercise your legal rights, please contact the Data Privacy Manager using the details set out below.

### **Contact details**

Full name of legal entity:	Sandbach Gymnastics Ltd
Name or title of Data Privacy Manager:	Office Manager
Email address:	sanbachgymnastics@yahoo.co.uk
Postal address:	Sandbach Gymnastics Club CW11 3HT
Telephone number:	01270 767491

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

### **Changes to the privacy notice and your duty to inform us of changes**

The data protection law in the UK will change on 25 May 2018. Although this privacy notice sets out most of your rights under the new laws, we may not yet be able to respond to some of your requests (for example, a request for the transfer of your personal data) until 25 May 2018 as we are still working towards getting our systems ready for some of these changes.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

### **Third-party links**

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

## **3. THE DATA WE COLLECT ABOUT YOU**

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together follows:

- **Identity Data** includes first name, last name, username or similar identifier, date of birth, gender, British Gymnastic membership numbers and examination certifications, and photographic and moving images.
- **Contact Data** includes billing address, home address, email address and telephone numbers.
- **Financial Data** includes bank account details.
- **Transaction Data** includes details about payments from you and other details of donations or investments you have made to us.
- **Technical Data** includes internet protocol (IP) address, your login data, browser type, discovery design log, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website.
- **Profile Data** includes your username and password, your interests, preferences, feedback and survey responses.
- **Usage Data** includes information about how you use our website and services.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.

We do not collect any **Special Categories of Personal Data** about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership or genetic and biometric data). However, we do collect some health data in relation to medical conditions where it may benefit you to notify us of any health condition or disability you have so that we are aware of these conditions and how they affect you. This will allow us to take reasonable steps to accommodate specific needs or requirements you have when using our Gym. We will only process this type of data where we have your explicit consent. We do not collect any information about criminal convictions and offences.

#### **If you fail to provide personal data**

Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to invest your money in one of our projects). In this case, we may have to cancel our service you have with us but we will notify you if this is the case at the time.

## **4. HOW IS YOUR PERSONAL DATA COLLECTED?**

We use different methods to collect data from and about you including through:

- **Direct interactions.** You may give us your Identity, Contact and Financial Data by filling in forms on line or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
  - a. Enrol on one or more of our classes or camps;
  - b. Make an enquiry via our website;
  - c. Request marketing to be sent to you; or
  - d. Provide us some feedback.
- **Automated technologies or interactions.** As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and

patterns. We collect this personal data by using cookies, server logs and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies. If you require more information regarding our cookies please contact us.

- **Third parties or publicly available sources.** We may receive personal data about you from various third parties and public sources as set out below:
  - Contact, Financial and Transaction Data from providers of technical, payment and delivery services based inside the EU.
  - Identity and Contact Data from publicly available sources.
  - Identity and Contact Data from British Gymnastics and other accredited gymnastics associations and clubs.

## 5. HOW WE USE YOUR PERSONAL DATA

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.

### Purposes for which we will use your personal data

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please [contact us](#) if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

<b>Purpose/Activity</b>	<b>Lawful basis for processing including basis of legitimate interest</b>
To register your enquiry with the Gym, enrol on a class or squad, attend a camp or book a party	(a) Performance of a contract with you (b) Necessary for our legitimate interests
To manage our relationship with you which will include:  (a) Manage payments and fees and recover money owed to us;  (b) Manage and process class and squad	(a) Performance of a contract with you  (b) Necessary to comply with a legal obligation  (c) Necessary for our legitimate interests (including keeping our records updated and studying how customers use our products/services)

programmes, competitions and grades;

(c) Asking you to leave a review or take a survey

(d) Notifying you about changes to our terms or privacy policy

(a) Performance of a contract with you

To enable you to leave a review, provide feedback or complete a survey

(b) Necessary for our legitimate interests (to study how customers use our services, to develop them and grow our business)

To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)

(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business, reorganisation or group restructuring exercise)

To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you

(b) Necessary to comply with a legal obligation

Necessary for our legitimate interests (to study how customers use our services, to develop them, to grow our business and to inform our marketing strategy)

To make suggestions and recommendations to you about services that may be of interest to you

Necessary for our legitimate interests (to develop our products/services and grow our business)

## **Marketing**

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising.

### **Promotional offers from us**

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which services and offers may be relevant for you (we call this marketing).

You will receive marketing communications from us if you have requested information from us or if you are a Gym user, in each case, you have not opted out of receiving that marketing.

### **Third-party marketing**

We do not share your personal data with any third parties for the purposes of marketing. Should this change, we will get your express opt-in consent before we share your personal data with any company for marketing purposes.

### **Opting out**

You can ask us to stop sending you marketing messages at any time by logging into the website and checking or unchecking relevant boxes to adjust your marketing preferences or by contacting us at any time using the details contained in the Contact section above.

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of an enquiry or your use of our Gym which we may continue to process under a lawful basis as indicated in the table at section 4 above.

### **Cookies**

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly. For more information about the cookies we use, please see our [cookie policy](#).

### **Change of purpose**

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 you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please [contact us](#). 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.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

## **6. DISCLOSURES OF YOUR PERSONAL DATA**

We may have to share your personal data with the parties set out below for the purposes set out in the table in paragraph 4 above.

- External Third Parties as set out in the Glossary.
- Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy notice.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your

personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

## 7. INTERNATIONAL TRANSFERS

We do not transfer your personal data outside the European Economic Area (EEA).

A small number of our third party suppliers operate their businesses from the US and there may be some processing of your personal data involving a transfer of data outside of the EEA. Where this occurs, we ensure a similar degree of protection is afforded to it by ensuring that safeguards are implemented through the EU Commission authorised Privacy Shield. This requires our third party suppliers to provide similar protection to personal data shared between Europe and the US. For further details, see European Commission: EU-US Privacy Shield.

Please contact us if you want further information about this.

## 8. DATA SECURITY

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

## 9. DATA RETENTION

### How long will you use my personal data for?

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

Details of retention periods for different aspects of your personal data can be request from us by [contacting us](#).

In some circumstances you can ask us to delete your data: see **Request erasure** below for further information.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

## 10. OUR LEGAL RIGHTS

Under certain circumstances, you have rights under data protection laws in relation to your personal data. 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 data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

**Request erasure** of your personal data. This enables you to ask us to delete or remove personal data where there is no good 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 successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

**Object to processing** of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

**Request restriction of processing** of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

**Request the transfer** of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

**Withdraw consent at any time** where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain



products or services to you. We will advise you if this is the case at the time you withdraw your consent.

If you wish to exercise any of the rights set out above, please [contact us](#).

### **No fee usually required**

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

### **What we may need from you**

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

### **Time limit to respond**

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

## **11. GLOSSARY**

### **LAWFUL BASIS**

**Legitimate Interest** means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by [contacting us](#).

**Performance of Contract** means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

**Comply with a legal or regulatory obligation** means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

## **THIRD PARTIES**

### **External Third Parties**

- Service providers acting as processors based within the EEA who provide IT, system administration and office services.
- Service providers acting as processors based in the US who provides IT and marketing systems support services (such as Firetext and Mailgun).
- Certification bodies for gymnastics awards such as British Gymnastics and other gymnastic clubs where events/examinations/awards are held.
- Professional advisers acting as processors or joint controllers including lawyers, bankers, auditors and insurers based within the EEA who provide consultancy, banking, legal, insurance and accounting services.
- HM Revenue & Customs, regulators and other authorities acting as processors or joint controllers based in the United Kingdom who require reporting of processing activities in certain circumstances.

## **12. CHANGES TO THIS PRIVACY NOTICE**

We reserve the right to update this privacy notice at any time, and we will provide you with a new privacy notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.

If you have any questions about this privacy notice, please contact the Data Privacy Manager on 01270 767491 or email – [sandbachgymnastics@yahoo.co.uk](mailto:sandbachgymnastics@yahoo.co.uk)