

## Privacy Policy

Fit For Sport Limited is committed to protect the privacy of individuals who either visit our website, make a booking through our customer service agents, such as over the phone and those who participate and attend one of our services.

This Privacy Policy covers Fit For Sport's use of personal data collected from you or your child. References to 'your personal data' includes the personal data of any child for whom you make a booking.

### 1. Data Controller

The Data Controller who is responsible for your personal data is Fit For Sport Limited whose office is situated at 5a Millars Brook Business Park, Molly Millars Lane, Wokingham, Berkshire, RG41 2AD. Our contact details are Tel: 020 8742 4990, email: [enquiries@fitforsport.co.uk](mailto:enquiries@fitforsport.co.uk)

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 appreciate the chance to deal with any concern you have prior to raising the issue with the ICO.

### 2. Personal Data collected from you and how it is processed

When using our website's online facilities or when opening an account with our customer service team, you will be required to provide personal data in relation to yourself but also for the children who you will register to attend our services. When providing any personal information relating to a child you warrant that you are a person with parental responsibility for such child.

Personal data in this Privacy Policy means information that specifically identifies you (or your child) as an individual or is capable of doing so.

#### *Information we collect about you*

Personal data is collected from you when you register to use our services, make bookings, enter into any of our competitions or promotions, submit a customer review, apply for a job or enter into correspondence with us.

The information we collect about you, as both the person with parental responsibility for the child registering for our services and the account holder is:

- Name and contact details of the account holder and 2 additional emergency contacts
- Confirmation of parental responsibility
- Communication preferences – i.e. newsletter product and service updates

In addition, we will collect from you details of any child that you are registering for participation in any of our services. The information we collect from you about such children is summarised as follows:

- Name,
- Date of birth,
- School/Venue attended (for school specific clubs/holiday clubs),

- Medical information including contact details of GP
- Various permissions

The collection by us of any health or special care related information is so that we can ensure our services are run safely and the interests of your child are protected while in our care.

In order to protect the interests of the children attending our services we may from time to time determine that attendance of a particular child due to health or other requirements is not in the best interests of that child or the other children. We will not share this information with any other third parties unless in an emergency such as to health workers in the event your child becomes ill.

We may also collect and store information about the behaviour of you or your child as part of our behaviour expectations as set out in the Booking Terms and Conditions. We will discuss any issues with you first, but we may need to share this information with a school (if the service is being provided as part of a school programme).

### ***Information we collect from other parties other than yourselves.***

We generally only collect information directly from you about you and your child and sometimes information direct from your child. In some limited situations, such as where a school or local authority is providing the funding for your child's attendance, registration information about you and the child may be provided directly by them.

In addition, we may collect from other parties practical and operational information such as child whereabouts on a particular day from a school in order to ensure safe and proper collection of such children from their school activities.

### ***Information we provide to third parties***

We generally do not provide any personal data about you or your child to a third party. However, the following are times when personal data is provided to a third party:

- To any contracted activity professional who helps us run and supervise any specific activity session
- To a school, venue or local authority or other party who is providing access to the facilities used for the activity course and where such information is needed for registering those at the facility
- Where we are required to under our OFSTED registration or other legal obligations, which may include situations where notification is needed to a regulatory or supervisory authority in connection with the welfare of the child, or otherwise.

### ***How we use any personal data collected from you.***

We use personal data collected from you principally for the purposes of providing our services. We generally do not share information with other parties unless required by law as described in this Privacy Policy.

We will only collect and process your personal data when the law allows us to. Most commonly the basis upon which we process your data or that of your child is in the following circumstances:

- Where we need to perform the booking that we are about to enter into or have entered into with you.
- Where it is necessary for our **legitimate interests** to allow us to organise and run safe and enjoyable activity courses for all attendees. We make sure that we consider and balance any potential impact on you or your child (both positive and negative) and your rights before we process your personal data for our legitimate interests. If the data relates to your child we will give extra consideration to the interests of your child. We will ensure that no such personal data is processed where the impact on you (or your child) overrides our interests unless we have your consent or are required or permitted by law.
- To send you newsletters or other communications that you have consented to receive. You may unsubscribe from these at any time by clicking the link in the communication or by logging onto your customer account and amending your preferences
- Where we are under a legal or regulatory obligation

### 3. International Transfers

We do not transfer your personal data outside of the European Economic Area

### 4. 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.

### 5. 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 are available in our retention policy which you can request from us by [sending an email](mailto:enquiries@fitforsport.co.uk) to: [enquiries@fitforsport.co.uk](mailto:enquiries@fitforsport.co.uk)

## 6. Your 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 submit a written request to the Fit For Sport Data Protection Officer.

### **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.

## **7. Cookies**

When you visit our website, we also collect information automatically about your visits, such as browsing patterns. However, information collected in this way is only used in aggregate and anonymous form rather than being linked to identifiable individuals.

When you visit our website, we may send you cookies. Cookies are small pieces of data that our site transfers to your computers' hard drive when you visit the website. A cookie will typically contain the name of the domain from which the cookie has come, the "lifetime" of the cookie and a value which usually is a randomly generated unique number. The following two types of cookies are used on our website:-

### **Session Cookies**

These are temporary cookies that remain in the cookie file of your browser until you leave our website. These allow you to carry information across the pages of our website and avoid you having to re-enter information.

### **Third Party Cookies**

Third parties provide persistent cookies via our website. These are used to compile anonymous, aggregated statistics in order to serve advertisements on our website and track whether these advertisements are clicked on by users in order to control how often you are shown a particular advertisement. They also count the number of anonymous users of the website and provide security within transactions.

Our cookies cannot be used by themselves to identify you. You have the ability to accept or decline cookies by modifying the setting in your browser. However, you may not be able to use all of the interactive features of our website if the cookies are disabled. You may disable cookies through your browser by following the instruction on [www.allaboutcookies.org/manage](http://www.allaboutcookies.org/manage)

## **8. Links to other Web Sites**

To give you a better service our site contain links to other local and national organisations websites. When connecting to other websites we recommend that you read the privacy statements on entering other such websites as you will no longer be subject to this policy but to the privacy policy of the new site.

## **9. Changes to our Privacy Policy**

If there are any changes to this Privacy Policy, we will replace this page with an updated version. It is therefore in your own interest to check the "Privacy Policy" page any time you access our web site so as to be aware of any changes which may occur from time to time.

## **10. Feedback**

Any comments or suggestions on how we manage your privacy will be welcome and can be submitted by emailing [enquiries@fitforsport.co.uk](mailto:enquiries@fitforsport.co.uk)