

PRIVACY NOTICE TO MEMBERS



THE PURPOSE OF THIS NOTICE

This privacy notice applies to all members of any Winners 2000 Fitness Ltd club.

Winners 2000 Fitness Ltd ('we', 'us') is committed to protecting the privacy and security of your personal information. This notice describes how we collect and use personal information about you, in accordance with the law which governs data protection.

It is important that you read this notice, together with any updating privacy notice we may issue to you, so that you are aware of how and why we are using such information.

WHO WE ARE AND HOW TO CONTACT US

We are a data controller. This means that according to data protection law, we are responsible for deciding how we hold and use personal information about you. We are also required by law to provide you with the information in this notice.

We can be contacted via the following details:

Registered office: Pam Verrall, 168 Teignmouth Road, Torquay, Devon, TQ1 4RY, or by email to: pam@winners2000.co.uk.

HOW DO WE COLLECT AND USE YOUR PERSONAL INFORMATION?

We will usually only collect your personal information from you directly, and not from any other sources. We will usually collect information from you when you first apply for membership with us and during the induction process. We will also update this information throughout your membership if we are notified of any changes.

Generally, we will collect, use and store your personal information in order to provide you with membership services. We may need this information (for example), in order to:

- Provide you with secure entry and access to our facilities
- Provide you with induction training and personal training assistance (if applicable) throughout your membership
- Register you with our fitness classes
- Ensuring your health and safety when using any of our fitness facilities or classes

THE KIND OF INFORMATION WE HOLD ABOUT YOU

We will collect, store and use the following personal information:

- Personal contact details, such as your name, address, telephone number and email address
- Date of birth
- Occupation



- Bank details for the purposes of processing your payment for membership and classes and/or setting up a standing order or direct debit payment instruction
- Emergency contact details
- Photographs, for example for your membership pass. We may also use photographs of our gyms and fitness classes for marketing promotional purposes on social media.
- CCTV footage in operation at our gym facilities
- Your use of our facilities, recorded by members' electronic swipe cards for entry and exit

We will also collect, store and use sensitive personal information concerning your health and medical history and any medical conditions which could affect you and your safety when using our fitness facilities. We take the protection of your sensitive personal information seriously, and ensure that we implement appropriate security measures and safeguards to protect it.

WHY OUR USE OF YOUR PERSONAL INFORMATION IS LAWFUL

We will only use your personal data in accordance with the law governing data protection. We need all of the categories of information listed above, primarily to allow us to **perform our contract** with you, or to take steps at your request, to enter into a contract with you.

We may on occasions require information including your contact details, emergency contact and medical history in order to comply with our **legal obligations**, for example under health and safety laws.

Less commonly, we may need to use your personal information:

- In order to protect your **vital interests** (or those of another individual), where you (or they) are unable to provide consent
- To bring or defend a **legal claim**
- Where this is in the **public interest**, in compliance with the law (for example, to ensure equality of opportunity or treatment in the way we provide services to you)

Some of the above grounds for processing will overlap and there may be several grounds which justify our use of your personal information.

In some cases we may use your personal information to pursue **legitimate interests** of our own or those of third parties, where we are satisfied that your interests and fundamental rights do not override those interests.

In certain circumstances, we may require your **consent** in order to use your personal information, for example where we use photographs containing your image for promotional and marketing purposes on social media. Where we need your consent, we will provide you with full details of what we require and why we need it, so that you can carefully consider whether you wish to consent. We will also explain to you the implications of not providing that consent and how that will affect you. You have the right to withdraw your consent at any time, by notifying Pam Verrall at: pam@winners2000.co.uk or by writing to 168 Teignmouth Road, Torquay, Devon, TQ1 4RY.



CHANGE OF PURPOSE

We will only use your personal information 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 information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

We may update this notice at any time, but we will notify you of any significant changes which affect you.

WHAT IF YOU FAIL TO PROVIDE US WITH YOUR INFORMATION

If you fail to provide us with some types of personal information when requested, we may be unable to perform our contract with you, or this may prevent us from complying with our legal obligations. If this is the case, you may be unable to complete the induction process and become a member.

AUTOMATED DECISION-MAKING

Automated decision-making takes place when an electronic system uses personal information to make a decision without human intervention. We do not envisage that any decisions will be taken about you using automated means, however we will notify you in writing if this position changes.

WHO DO WE MAKE YOUR PERSONAL INFORMATION AVAILABLE TO?

We will only share your personal information with third parties in accordance with data protection law, in accordance with our legal obligations and / or the other purposes described in this notice. Where your personal information is shared with third parties, we require them to respect the security of your information and to treat it in accordance with the law. Other than data sharing with emergency services, we only permit third parties to process your personal data for specified purposes and in accordance with our instructions.

Examples of circumstances in which we share your personal information with third parties include:

- **other gyms and trainers within Winners 2000 Fitness Limited**, in order to provide you with a comprehensive, joined up membership service across all of our facilities
- our **insurers and lawyers** (in relation to any incident or claim which may arise)
- **emergency services** and other statutory public bodies, in accordance with our legal obligations, for example in order to report an accident or incident
- with our **third party IT provider** in accordance with our legitimate interests in creating and maintaining a secure and efficient system for the storage and filing of members' information

TRANSFERRING INFORMATION OUTSIDE THE EU

We will not transfer your data outside the EU .



HOW DO WE KEEP YOUR PERSONAL INFORMATION SAFE?

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

We have put in place procedures to deal with any suspected data security breach. We will notify you and/or the Information Commissioner's Office (**ICO**), who regulate compliance with data protection law, of a suspected breach where we are legally required to do so.

HOW LONG WILL WE KEEP YOUR INFORMATION FOR?

We will only keep your personal information for as long as necessary to fulfil the purposes we collected it for. We will usually keep your personal information for a period of 3 years following the termination of your membership with us. We may in certain cases be required to keep your data for longer where this is necessary, for example in order to bring or defend a legal claim, or to comply with any of our other legal obligations.

KEEPING YOUR INFORMATION UP-TO-DATE

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

YOUR RIGHTS

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

- **Request access** to your personal information, including a copy of the personal information we hold about you and information about how we are processing it
- **Request correction** of any incomplete or inaccurate personal information that we hold about you
- **Request that we delete or remove** your personal information where there is no good reason for us continuing to process it
- **Object to processing** of your personal information in circumstances where we are relying on our legitimate interests (or those of a third party) or where we are processing your information for direct marketing purposes
- **Request the restriction of processing** of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it
- **Request the transfer** of your personal information to another data controller



If you want to exercise any of the rights listed above, please contact Pam Verrall in writing at: pam@winners2000.co.uk or 168 Teignmouth Road, Torquay, Devon, TQ1 4RY.

YOUR RIGHT TO COMPLAIN

If you have any questions about this privacy notice or how we handle your personal information, please contact Pam Verrall at: pam@winners2000.co.uk or 168 Teignmouth Road, Torquay, Devon, TQ1 4RY.

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.

