



## Northampton Leisure Trust Privacy Policy

NLT is committed to respecting your privacy when you use our services.

This Privacy Policy relates to customer data processed and stored by Northampton Leisure Trust (NLT). NLT as the Data Controller is registered with the Information Commissioner's Office (ref: Z2605102).

This Privacy Policy informs customers and users about the collection, use and sharing of personal information we collect on our website, on our App, at our centres, venues and through the various leisure and health services we offer. By using these channels you are consenting to us processing your information in the ways stated in this notice.

This notice applies to you if you have registered to become or are a member of our club and is designed to protect you, by informing you how personal information is collected, how we look after that information and with whom we share it.

### **1. Personal information we may collect from you and the reason why**

The basis on which we collect and process your data is usually through consent. Sometimes there is a contractual reason such as being able to process a monthly direct debit payment. Occasionally there may be a legal reason for collecting data, such as should you have an accident, we may need to provide details to the relevant health and safety authorities. We may also process your data based on legitimate business interests for example to operate and improve our business and the services we provide.

### **2. The type of information we may collect from you**

#### **2.1 Any personal details you give us or we obtain from third parties.**

Information you type into our website or provide to one of our colleagues such as when you become a member, create your profile, update your member profile, provide activity data from other devices, make a booking, sign up as a volunteer, visit one of our centres or use any of our leisure services. This information may include your personal contact data, fitness-related data which has been obtained in order to create personalised fitness programmes for you or health related data. We use this to provide you with the services you request, tell you about the services you are eligible for, to keep in contact with you, manage your account and the services we provide. If you contact us by email, via the

website, in person or by telephone we may keep a record of your contact information and enquiry and may subsequently use your contact details to respond to your enquiry.

## **2.2 Information which allows us to recognise you.**

Such as unique ID number; storing this data saves you from re-entering your details again when you return to the website. We can also recognise you by your photograph allowing us to ensure that your card is not misused if lost or stolen and helps us to identify you to ensure we support you on your activity journey.

## **2.3 Details of your transactions**

We collect data for any transactions you carry out through our website and services, so that we can administer the services you have with us. Please note that we never store your payment details on our website.

## **2.4 Sensitive Health Data**

We collect any personal health data you provide to us when registering and signing up for our health services. We collect this information to ensure we are offering you the right services and so your progress can be tracked by yourself and us. We may ask you for information about your health in order to recommend appropriate exercise regimes or offer our other services.

## **2.5 Banking data**

We process bank card information at the time we take payment. This data is not stored on our systems and is processed on Payment Card Industry Data Security Standard compliant banking systems.

## **2.6 Information about website visits including IP address –**

The IP address is your computer's individual identification number. We use your IP address to capture information about website visits so we can learn more about how our customers use the website in order to find ways to improve the website and our products and services for your benefit. (For further information our Cookie Policy can be viewed on our website [www.trilogyleisure.co.uk](http://www.trilogyleisure.co.uk))

## **2.7 Customer Feedback**

We will record customer comments and surveys about how we are performing and to make improvements to the service we provide.

## **2.8 Other Sensitive data**

We are sometimes required to collect information about your ethnicity and other sensitive data in order to provide aggregated reports to your local authority or commissioning group. This information is used only for statistical purposes and is always kept secure. If you prefer not to provide us with this data we will not hold your data.

## **2.9 Your communications preferences**

We keep a record of any permissions and preferences you give us about what types of communication you are happy to receive from us and you can update these at any time by emailing [GDPR@nltrust.org.uk](mailto:GDPR@nltrust.org.uk)

## **2.10 Data relating to children**

Our services are used by people of all ages. NLT may accept website registrations and collect personal information from individuals under the age of 13. Children under 13 years must have a parent or guardians consent before providing personal information to us. We do not wish to collect any personal information without this consent.

## **3. How we store and protect your personal information**

These are the basic guidelines we use to look after your personal data.

- We maintain secure systems to protect your personal information
- We respect your wishes about how we contact you, whether by post, telephone, email or txt message
- We will update your information or preferences promptly when you ask us to
- We will respond fully to requests from you to see the information that we hold on you
- We will not hold your personal information for longer than is necessary for our legitimate business purposes.
- We will follow strict procedures when storing or handling information that you have given us. Some information is encrypted, such as payment transactions and passwords.
- We will never sell your personal information to a third party

NLT reserves the right to store and process information securely outside the European Economic Area (“EEA”).

### **3.1 Our Retention Policy**

We retain personal information for as long as we consider it useful to contact you, or as needed to comply with our legal obligations. Where data is not needed for legal or statutory purposes we will delete this information at your request.

### **3.2 Services provided by contracted third parties**

We may share information with third party organisations that provide specific services on our behalf which enhance our products and your experience with us. These organisations act as a Data Processor under our instructions. They may process data securely outside of

the EEA. There is a contract in place with each third party which includes strict terms and conditions to protect your privacy.

Our current processing partners include MyZone, Technogym, Life Fitness, Harlands and Delta.

Please note: Use of services provided by our partners will be subject to the terms and conditions and/or Privacy Policies of these third party organisations

### **3.3 Leisure and Health Partners**

We operate services on behalf of other organisations such as Local Authorities, NHS, Clinical Commissioning Groups and Trusts. These services are often run under a franchise or contract agreement. Data may be shared with these organisations at a summary level but not at a personal identifiable level. For our health related services, with your consent, we may share identifiable information with your GP and NHS services.

At the end of a franchise, if the service is to be run by another operator, we will forward on your details, to the new operator so they can continue to provide the service to you without interruption. If you do not wish us to do this please send a request to [GDPR@nltrust.org.uk](mailto:GDPR@nltrust.org.uk)

These organisations will be a Data Controller in their own right, and where they do process your data they will inform you directly or through their services such as a website and the data they hold and what processing they undertake.

### **3.4 Marketing Partners**

We will never sell your personal information to any third party for marketing or other purposes.

## **4. How we use your information**

**We use your information to help us provide and improve our services for you.**

### **4.1 We may use your information in the following ways:**

- To provide you with any services that you have purchased or receive free as part of a health or other scheme
- To check your identity
- To check your eligibility where appropriate
- To update our records with any new information you give us
- To notify you if we will be unable to provide a service you have booked before
- To provide marketing communications (if you have given us your permission)
- For research and analysis so we can develop and improve our services for your benefit

- To tailor our communications to you to ensure relevance
- To comply with legal requirements
- To safeguard users of our services

#### **4.2 Keeping you updated**

There are certain communications we need to send to you so we can provide our services. We call these service communications and include for example notices about your direct debit payments, change of password, registration confirmations, appointment reminders and waiting list announcements. We would not be able to provide you with services if we did not send these.

We may from time to time contact you about our services or products we think you may find interesting by email, by post, telephone or SMS texts, but only if you have given us your permission to do so.

If you do not want us to contact you other than for service emails let us know when you next visit us, or contact us using the details below. You can opt-out of email communications by clicking on the 'unsubscribe' link on any emails we send you. You may also opt-out of email or any other communications by contacting [GDPR@nltrust.org.uk](mailto:GDPR@nltrust.org.uk)

### **5. Your rights to manage your personal data**

#### **5.1 Accuracy of data**

We will always try to ensure the data we hold about you is accurate and relevant. If you believe the information we hold about you is out of date or incorrect, please tell a member of staff or email [GDPR@nltrust.org.uk](mailto:GDPR@nltrust.org.uk) you will need a form of identification to request any changes.

#### **5.2 Seeing your data**

The General Data Protection Regulation gives you the right to know what personal information we hold about you. This is called a Subject Access Request. If you would like to make a request you should write to the Data Controller at [GDPR@nltrust.org.uk](mailto:GDPR@nltrust.org.uk)

#### **5.3 Removing your data**

If you no longer use our services and products and wish us to delete your personal data we will do this if there are no legal or statutory regulations requiring us to keep this information. Please write to the Data Controller at [GDPR@nltrust.org.uk](mailto:GDPR@nltrust.org.uk)

#### **5.4 Restricting processing**

You can contact us to restrict the processing of your data including some processing we do under legitimate business interests.

## **6. Complaints about how we manage your data**

If you are not happy about the way we manage your data please contact us as quickly as possible through the Data Controller – who will investigate your complaint and get back to you as soon as possible.

## **7. Information Commissioner's Officer (ICO)**

The ICO is the UK's independent authority set up to uphold information rights. You have the right to contact them should you wish. Details can be found on their website:

<https://ico.org.uk/>

## **8. Links to other websites**

Our website may contain links to and from external websites, advertisers and affiliates. If you follow a link to other sites please note that these will be governed by their own privacy policies. We cannot accept liability for data use on those websites.

## **9. Changes to this privacy policy**

This policy may be updated from time to time. If you have any questions or comments about our Privacy Policy or how we use your personal information please contact us at [GDPR@nltrust.org.uk](mailto:GDPR@nltrust.org.uk)

Last reviewed: October 2019