Privacy Policy Author: Bridport and West Dorset Sports Trust Revision Date: 11/04/2018 Version: V1

# BRIDPORT & WEST DORSET SPORTS TRUST

# PRIVACY POLICY

#### **Document Control**

Document Owner:	Document No:	Status:	Date Approved:
B&WDST	1	Approved	4 May 2018
Security Classification:	Next Review Date:	Version:	Department:
High	1 May 2019	V1	Membership

# **Bridport and West Dorset Sports Trust Privacy Policy**

# Who We Are

**Bridport and West Dorset Sports Trust (B&WDST)** (*'we' or 'us' or 'our'*) gather and process your personal information in accordance with this privacy notice and in compliance with the relevant data protection Regulation and laws. This notice provides you with the necessary information regarding your rights and our obligations, and explains how, why and when we process your personal data.

B&WDST's registered office is at **Bridport Leisure Centre, Brewery Fields, Bridport, DT6 5LN** and we are a company registered in England and Wales under company number 1218639. We act as the data controller/data processor when processing your data. Our designated Data Protection contacts are Nigel Williams, William Thrower and Sally Bragg who can be contacted at **Bridport Leisure Centre, Brewery Fields, Bridport, DT6 5LN**.

# Information That We Collect

B&WDST processes your personal information to meet our legal, statutory and contractual obligations and to provide you with our products and services. We will never collect any unnecessary personal data from you and do not process your information in any way, other than as specified in this notice.

#### The personal data that we collect from is: -

- Name
- Date of Birth
- Home Address
- Personal Email
- Home Telephone Number
- Mobile Telephone Number
- Special Category Data when appropriate (*i.e. health/medical information*)

#### We collect information in the below ways: -

Online Forms In House Forms In House Digital Surveys Marketing

# How We Use Your Personal Data (Legal Basis for Processing)

B&WDST takes your privacy very seriously and will never disclose, share or sell your data without your consent; unless required to do so by law. We only retain your data for as long as is necessary and for the purpose(s) specified in this notice. Where you have consented to us providing you with promotional offers and marketing, you are free to withdraw this consent at any time. *The purposes and reasons for processing your personal data are detailed below: -*

- We collect your personal data in the performance of a contract or to provide a service.
- We collect and store your personal data as part of our legal obligation for business accounting and tax purposes
- We will occasionally send you marketing information where we have assessed that it is beneficial to you as a customer and in our interests. Such information will be non-intrusive and is processed on the grounds of legitimate interests

# Your Rights

You have the right to access any personal information that B&WDST processes about you and to request information about: -

- What personal data we hold about you
- The purposes of the processing
- The categories of personal data concerned
- The recipients to whom the personal data has/will be disclosed
- How long we intend to store your personal data for
- If we did not collect the data directly from you, information about the source

If you believe that we hold any incomplete or inaccurate data about you, you have the right to ask us to correct and/or complete the information and we will strive to do so as quickly as possible; unless there is a valid reason for not doing so, at which point you will be notified.

You also have the right to request erasure of your personal data or to restrict processing (*where applicable*) in accordance with the data protection laws; as well as to object to any direct marketing from us. Where applicable, you have the right to data portability of your information and the right to be informed about any automated decision-making we may use.

If we receive a request from you to exercise any of the above rights, we may ask you to verify your identity before acting on the request; this is to ensure that your data is protected and kept secure.

## **Sharing and Disclosing Your Personal Information**

We do not share or disclose any of your personal information without your consent, other than for the purposes specified in this notice or where there is a legal requirement. B&WDST uses a third-party to provide the below services and business functions; however, all processors acting on our behalf only process your data in accordance with instructions from us and comply fully with this privacy notice, the data protection laws and any other appropriate confidentiality and security measures.

#### **Secure Collections**

We use DFC to do some of our Direct Debit processing and they act in the capacity of a processor on our behalf. The only information we provide them with is your name and bank account details to meet payment requirements.

For more information about DFC, please read their Privacy Notice at <u>www.debitfinance.co.uk</u>

#### **Safeguarding Measures**

B&WDST takes your privacy seriously and takes every reasonable measure and precaution to protect and secure your personal data. We work hard to protect you and your information from unauthorised access, alteration, disclosure or destruction and have several layers of security measures in place, *including:* -

SSL, TLS, encryptions, pseudonymisation, restricted access, IT authentication, firewalls, antivirus/malware etc

#### Transfers Outside the EU

Personal data in the European Union is protected by the General Data Protection Regulation (GDPR) but some other countries may not necessarily have the same high standard of protection for your personal data. B&WDST does not transfer or store any personal data outside the EU.

#### Consequences of Not Providing Your Data

You are not obligated to provide your personal information to B&WDST however, as this information is required for us to provide you with our services/legitimate interests, we will not be able to offer some/all of our services without it.

#### How Long We Keep Your Data

B&WDST only ever retains personal information for as long as is necessary and we have strict review and retention policies in place to meet these obligations. We are required under UK tax law to keep your basic personal data (*name, address, contact details*) for a minimum of 6 years after which time it will be destroyed.

Where you have consented to us using your details for direct marketing, we will keep such data until you notify us otherwise and/or withdraw your consent.

#### **Special Categories Data**

Owing to the products, services or sessions that we offer, B&WDST sometimes needs to process sensitive personal information (*known as special category data*) about you. We use your medical information to ensure our services are suitable for you. Where we collect such information, we will only request and process the minimum necessary for the specified purpose and identify a compliant legal basis for doing so.

Where we rely on your consent for processing special category data, we will obtain your explicit consent through a signature/explicit mechanism. You can modify or withdraw consent at any time, which we will act on immediately, unless there is a legitimate or legal reason for not doing so.

You have the right to withdraw from receiving or participating in any of the above, by contacting Bridport Leisure Centre.

To unsubscribe, please e-mail: info@bridportleisure.com stating, 'Opt Out - Special Categories Data'.

#### Marketing

#### CONSENT

Occasionally, B&WDST would like to contact you with services and promotions that we provide. If you have provided consent to us using your contact details for this purpose, you have the right to modify or withdraw your consent at any time by using the opt-out/unsubscribe options or by contacting B&WDST directly.

To unsubscribe, please e-mail: <u>info@bridportleisure.com</u> stating, '**Opt Out** - Marketing' and state the methods that you no longer wish to be contacted by.

#### LEGITMIATE INTERESTS

B&WDST will occasionally send you information on specific promotions and services by email that has been identified as being beneficial to our customers and in our interests. Such information will be relevant to you as a customer and is non-intrusive and you will always have the option to opt-out/unsubscribe at any time.

To unsubscribe, please e-mail: info@bridportleisure.com stating, 'Opt Out - Legitimate Interests'.

# Lodging A Complaint

B&WDST only processes your personal information in compliance with this privacy notice and in accordance with the relevant data protection laws. If, however you wish to raise a complaint regarding the processing of your personal data or are unsatisfied with how we have handled your information, you have the right to lodge a complaint with the supervisory authority.

Bridport and West Dorset Sports Trust Bridport Leisure Centre Brewery Fields Bridport DT6 5LN 01308 427464

Information Commissioners Office (ICO) Wycliffe House Water Ln Wilmslow SK9 5AF 0303 123 1113

# **Consent**

B&WDST takes your privacy seriously and will only process your personal data with your consent and in accordance with the terms stated in our Privacy Notice. If you **DO NOT** consent to us collecting and processing your personal data, please e-mail:

info@bridportleisure.com stating, 'Opt Out - Consent'.

## **Cookie Notice**

A **'cookie'** is a small piece of data sent from a website and stored on the user's computer by the user's web browser while the user is browsing. When you visit a site that uses cookies for the first time, a cookie is downloaded onto your computer/mobile device so that the next time you visit that site, your device will remember useful information such as items added in the shopping cart, visited pages or logging in options.

Cookies are widely used in order to make websites work, or to work more efficiently, and our site relies on cookies to optimise user experience and for features and services to function properly.

Most web browsers allow some control to restrict or block cookies through the browser settings, however if you disable cookies you may find this affects your ability to use certain parts of our website or services. For more information about cookies visit <u>https://www.aboutcookies.org</u>.