



Privacy Statement

Date: 24 May 2018

Who is the Data controller?

USP College
dataprotection@uspcollege.ac.uk

Why do we collect personal information?

We may collect and process the following data about you summarised by category:

Members, non-members and guests

Contact and identification details

We record your name, postal and email addresses, telephone number(s) and contact preferences when you enquire on our website or when you sign in as a guest. If one of our members makes a booking for you as a guest or recommends you as a friend they may provide us with your name, phone number and email address.

Payment details

If you pay for goods and services by card, we record your payment card details.

Correspondence and incidents

If you contact us we may keep a record of that correspondence and any comments and responses you submit via surveys and our feedback system.

Details about your child

If your child attends a supervised activity at our center we keep a record of their attendance, emergency contact details and essential health information e.g. allergies. If you or your child is involved in an incident at our center, we will record details of the incident.

Members

In addition, if you are a member, we may collect and process the following data about you summarised by category:

Contact and identification details

We record your date of birth and gender. We will also take your photograph when you join. If you give us evidence in support of your membership application we will keep it on file.

Payment details

We keep details of your membership package and fees for you and others linked to your membership and the payments you make to us. If you pay your membership and other fees by direct debit we keep a record of your bank details.

Usage and attendance details

We keep a record of when you attend using your membership card. We also hold information about your class bookings. We keep a note of vouchers and guest passes issued to you. We keep a record of your health and fitness goals if you choose to share them with us.

Your personal circumstances

If you give us evidence of relocation, redundancy or a medical condition in line with our cancellation or suspension policy we will keep it on file.

Non-members

If you are not a member we use the information that you provide or that we collect in line with this Privacy Policy and our Website Terms of Use on the basis of our legitimate business interests unless otherwise stated for the following purposes:

Contact and identification details

We use your contact details to respond to your enquiry or manage your booking and to let you know about our products and services which may be of interest (including through the use of email, phone and text if you have agreed to receive this information from us electronically).

Payment details

We use your payment card details to collect payment for goods and services.

Correspondence and incidents

We use your feedback to improve our facilities and services and to assist us in dealing with any query you may have. We record details of incidents to comply with our obligations under health and safety legislation.

Details about your child

We use the information you give us about your child to safeguard their health and safety.

Members and ex-members

If you are a member we use the information that you provide or that we collect in line with this Privacy Policy, our Terms and Conditions of Membership and our Website Terms of Use on the basis of our contract with you and our legitimate business interests unless otherwise stated for the following purposes:

Contact and identification details

We use your contact details to register you, to set up and manage your membership account and to administer our services in accordance with our terms and conditions; to contact you about changes to facilities, fees and membership terms; and to let you know about our products and services which may be of interest (including through the use of email and text if you have agreed to receive this information from us electronically).

Your personal circumstances

We use the information you give us to administer our policy on suspension or cancellation.

Correspondence and incidents

We use your feedback to improve our facilities and services and to assist us in dealing with any query you may have. We record details of incidents to comply with our obligations under health and safety legislation.

Details about your child

We use the information you give us about your child to safeguard their health and safety.

Special categories of personal data

We may process information about your health or your child's health, for example to ensure the safety of your child or to comply with our obligations under health and safety law. Where the processing is to provide a service to you, we will always ask for your agreement. If you are not happy for us to have this information you do not have to agree, and you can change your mind at any time, but this may mean that your child is unable to take part in a supervised activity.

How is this collected?

Most of the information above is collected directly from yourself via an application or enrolment form.

Where do we store data?

Data will be stored in a range of different places, including the electronic information management systems, on paper in stored secure places, or on electronic documents within a secure network. **Who has access to data?**

We value your privacy and do not sell your information to any third parties under any circumstances.

We share your card and bank details with our secure payment providers to process card transactions and direct debit payments.

We may share your data with anyone to whom we transfer or may transfer our rights and duties under our agreement with you, if we have a duty to do so or if the law allows us to do so. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction. We share data with third parties who will help process or administer our services or who will provide advice and take action in relation to the collection of debts.

How long does the organisation keep data?

We keep the information that you provide or that we collect only for as long as we need to in line with the reason it was collected. More detail is given below for each category of information.

Non-members and guests

We keep your contact details for up to a year after your first enquiry. We keep enough information to record your communication preferences indefinitely in order to avoid sending you unwanted information in future.

Members and ex-members

We keep your contact and identification details, usage and attendance details and information about your personal circumstances during your membership/course or hire booking for seven years after it ends so we can respond in the event of any query about your membership/activity. We may keep certain information for longer than this if we have a compelling reason for keeping it.

We keep enough information to record your communication preferences indefinitely in order to avoid sending you unwanted information in future.

We keep payment details during your membership and for seven years after you leave in line with the BACS code of practice.

CCTV recordings are deleted automatically after 40 days unless they are retained in connection with an investigation, in which case we keep them until after the investigation is concluded.

Why does the organisation need to process personal data?

USP College needs to process data so we can provide you with the highest standards of customer service we are able to give and to meet its legal obligations.

Where the organisation processes other special categories of personal data, such as information about ethnic origin, disability or health, this is done for the purposes of equal opportunities monitoring and to monitor our service provision to improve our services to specific groups. Any information that has been supplied under the lawful basis of consent can be withdrawn at any time by emailing the Data Protection Officer at dataprotection@uspcollege.ac.uk.

Contact details will not be used for marketing purposes without your consent, which can be withdrawn at any time. However, the college will use the contact information to contact you in order to carry out our duties to you, for example, to notify you of a change of course date.

What rights do you have?

You have the right to make a request for a copy of the personal data that we keep about you or to correct the details that we hold about you. We will respond within one month.

If you would like to know what personal information we hold about you, or would like us to correct the details we hold about you, you should write to the address below or email dataprotection@uspcollege.ac.uk, enclosing proof of your identity (such as a copy of your passport or driving license) and asking to see your personal information or asking us to correct the relevant information. You will have to give us enough information so we can identify the personal information you have asked to see or have corrected. We do not have to respond to your request until you have given us the information we need. We will contact you within one month of your request or, where we have asked for further information to identify you, within one month of receiving such information.

You have the right to receive the information in a portable electronic form. If your request is by email from the address that we hold for you we will respond by email to that address. You have the right to ask us to erase your personal data under certain circumstances. You have the right to ask us to stop processing your personal data where the processing is based on our legitimate interests. This does not include processing which is in line with our Terms and Conditions of Membership, for example payment processing. If we believe we have a legitimate reason for processing your personal information including for the defence of any legal claims we may decline your request.

Under certain circumstances, for example if we decline your request to stop processing, you have the right to ask us to restrict the processing of your personal data.

Updating your marketing preferences

We may use your personal information to provide you with marketing information about our products and services such as newsletters, product updates, surveys, company announcements and invites to events that will be of interest to you.

You can opt out of receiving marketing messages at any time by following the unsubscribe links located within any electronic communication from us.

Please note that, even if you opt out of receiving marketing messages, we may still send you service related communications where necessary.

Who can I complain to?

If you are unhappy about how your personal data is being processed you should raise your concern with us first - see "Contacting Us" below. If you are not happy with the way that we deal with your concerns you can contact the Information Commissioner's Office (ICO) at ico.org.uk

How does the organisation protect data?

In order to comply with our obligations under Data Protection law, we will protect your personal data from unauthorised access, misuse, alteration or loss by using commercially reasonable security measures. Any payment transactions will be encrypted using SSL technology.

Do we process data outside the EEA?

USP College will not transfer your data to countries outside the European Economic Area.

What if I do not provide personal data?

Failure to provide data required to meet legal obligations will result in us not being able to enrol you as a student. Failure to provide other information (except that requiring consent), for example learning difficulty information, may result in the college being unable to provide the standard of service we would wish to provide.

Does USP College use automated decision-making?

No, the college does not use automated decision-making.

