

## **Renfrewshire Leisure Data Privacy Statement**

### **Introduction**

Data protection legislation is changing. From 25 May 2018, EU General Data Protection Regulations come into force and apply to how we collect, manage and store your personal data.

The protection of your personal information remains extremely important to us. At Renfrewshire Leisure, we will only collect, process and store your personal data as set out in this Data Privacy Statement and in compliance with applicable data protection legislation.

This privacy statement explains what personal information Renfrewshire Leisure collects, how we use it to provide services to you and how you can check and update any of your personal information. The statement is available on our website alongside other related information security policies.

### **Our Privacy Statement Commitment to you...**

This privacy statement covers all Renfrewshire Leisure services. We, or our trusted partners, will only use your details to provide you with the service(s) which you, or someone else (with your CONSENT), have asked us to provide. In addition, we will only use your personal details for purposes of crime detection and prevention and/or where required by law and will only share it with other bodies for this purpose.

### **When we collect your personal information, we:**

- Will obtain your CONSENT to collect and process your information;
- Will request it to deliver services to you;
- Will make sure that you know why we need it;
- Will only ask for the information that we need for the purpose for which it is being sought;
- Will have a legitimate purpose for doing so, whereby processing is necessary:
  - for the performance of a task carried out in the public interest;
  - for compliance with a legal obligation to which we are subject;
  - to protect your vital interests or those of another person;
  - for the performance of a contract with you;
  - for the purposes of legitimate interests by ourselves or a third party except where such interests are by the interests, rights or freedoms of the data subject.

### **What type of data do we collect?**

Personal: Your name, address, age, et cetera.

Financial: Your debit or credit card details, bank details and other payment information (if applicable).

Sensitive: gender, relevant health information.

Other: Your interests and preferences.

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### **Where do we get your information?**

We collect information when you sign up with us, contact us, and when you use or purchase our services.

For example: when you sign up for a gym membership, join our mailing list, enter any promotions, competitions or prize draws through one of our services and you agree to be contacted.

### **How we use your information**

We use your personal data to keep in touch with you, to provide services to you, and to improve our services. We will also use your information to make you aware of any changes to the service you signed up for or to ask for your thoughts on the service we offer (e.g. customer surveys).

From time to time we may contact you with other information that we think are appropriate to you e.g. contacting gym members to advise them of a new fitness class coming into operation in our gyms.

We will also use your data to process financial transactions for the services you have purchased, to make sure that all amounts owed are paid on time. In relations to outstanding amounts owed, we may also share your data with trusted Debt Management Partners including Renfrewshire Council and the Courts. Where we do share this information, we will ensure that a data processing agreement is in place to safeguard your data.

### **Consent**

We will only process your information with your consent. In most cases, we will presume that by providing us with your details in order to obtain a service from Renfrewshire Leisure, that you are giving your consent to us in order to provide that service to you. We will ask you to give your consent to the use of your personal data, when you take a membership or join our mailing or marketing lists.

### **Legal obligations**

By law, we are required to provide information to other public bodies and charities including HM Revenues and Customs, courts, and other formal bodies dealing with legal processes, and various external regulatory bodies. We also have an obligation to assist in the prevention of crime and we will, therefore, supply information which we are asked to provide to the police or other crime prevention agencies, provided that we are satisfied that disclosure is lawful and proportionate.

### **How we share your information**

We work closely with a number of other public bodies and charities including Renfrewshire Council, NHS Greater Glasgow & Clyde, Sports Scotland, Macmillan Cancer Support. Information will generally only be shared with these partners with your consent.

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External contractors are appointed from time to time by Renfrewshire Leisure to process information on our behalf under our instruction. When they are appointed, data processing agreements (legal contracts) are put in place which requires the contractors to keep this personal data safe and secure and prohibits them from using this data for any other purpose.

Renfrewshire Leisure also carries out survey and carries out statistical analysis of the information that we hold so that we can monitor our performance to improve service delivery. Anonymised statistics which do not identify individuals may be published or shared with other parties.

### **Why we keep hold of your information**

There are certain reasons we have to keep hold of your information.

We keep information while you're our customer or after you've left us, but only as long as we need it for the purposes described above. How long we keep it depends very much on the type of information and purpose.

For example, we might need to sort out payment arrears on a gym membership.

In each case, the length of time that we need to keep the information may be different. Our data retention policy is available on our website.

### **Use and disclosure of staff information**

Employee information is held by Renfrewshire Leisure to carry out our duties as an employer. We will hold personal, financial and sensitive information as defined in the section above in order to comply with our legal obligations and role as employer.

We share this data with trusted partners including: Renfrewshire Council, as a data processor for Renfrewshire Leisure, to manage the payroll service; HMRC to allow for deduction of PAYE and national insurance contributions; trade unions to allow trade union subscriptions to be collected and; other recipients of payroll deductions or salary sacrifice schemes.

Full details of the use and disclosure of staff information is available in our employee privacy notice.

### **Your information rights**

You have a number of legal rights in relation to the information that we hold about you, including:

- **The right to request details of the information we have about you.** There are a couple of ways to do this and some requests have to be writing for legal reasons. You can contact us using the contact details in the section below.
- **The right to withdraw your consent to the use of your information** where we are relying on that consent (for example, you can opt out of receiving marketing messages from us). Please note that we may still be entitled to process your information if we have another legitimate reason for doing so.
- **The right to ask that we update your information if it is inaccurate or incomplete.**
- **The right to ask that we erase your information in certain circumstances.**

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- **The right to request that we restrict the processing of your information in certain circumstances.**
- **The right to make a complaint with the Information Commissioner** [www.ico.org.uk](http://www.ico.org.uk), if you think that any of your rights have been infringed by us.

You can exercise your rights by contacting us using the details set out in the "Contact us" section below

### **Contact us**

If you have any queries, please contact us at:

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Data Protection Officer,  
Renfrewshire Leisure,  
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Cotton Street,  
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