

Trinity Fitness Privacy Notice

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A. Introduction

The purpose of this notice is to inform customers about how Trinity Fitness collects, uses and shares their personal data, and their rights in relation to the personal data we hold. This notice is available on the Trinity Fitness website.

B. Who is processing personal data

Trinity Fitness as part of Leeds Trinity University determines why and how your personal data is used and is considered to be the data controller of the personal data. The University is registered with the Information Commissioner's Office as a data controller under the reference Z4817023.

C. What personal data do we process

Trinity Fitness processes personal data that is necessary for us to administer and deliver services to you. This includes:

- information about you and your contact details so that we can contact you about services relevant to you
- your date of birth
- emergency contact details
- financial information obtained for the purposes of payment of services from Trinity Fitness
- for services provided to children under age 18 years we collect parental contact information for approving the terms of the privacy notice.

Special category data

We may also process "special category data" which includes information about your health in order to understand any medical conditions which may affect your participation in activities at Trinity Fitness.

D. The legal basis for processing your personal and special category data

(i) Contract

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We may process your personal data and special category data because it is necessary for us to do so in order to fulfil the contract you enter into with Trinity Fitness when registering as a member or customer of services provided.

(ii) Legitimate interests

We may use and process your personal information where it is necessary for us to pursue our legitimate interests or a third party's legitimate interest. Such legitimate interest can include:

- verifying the accuracy of data that we hold
- recovering money that is owed to us
- providing a safe and healthy environment, ensuring wellbeing and the prevention and investigation of inappropriate activity
- minimising the risk to the public as well as the delivery and continuation of operations

(iii) Legal obligation

We may also process your personal data for our compliance with legal obligations. This can include:

- compliance with regulatory obligations such as anti-money laundering laws and safeguarding requirements
- assisting with investigations (including criminal investigations) carried out by the police and other competent authorities
- complying with court or other competent authority orders
- compliance with relevant national Health & Safety legislation, in particular government guidelines surrounding COVID-19 test and trace or other crisis management schemes

(iv) Vital interests

Trinity Fitness will only rely on vital interests as a lawful basis for processing your personal data where it is necessary to protect someone's life such as in the event of a medical emergency.

(v) Consent

Trinity Fitness will use consent as a lawful basis for some processing. Where we do so we always provide you with the choice as to whether or not to opt in to such processing.

E. What we use personal and sensitive data for

Trinity Fitness processes your personal and special category data for the following reasons:

- the provision of services you have registered for at Trinity Fitness
- maintaining records of members, community block bookings and customers
- evaluating the performance and effectiveness of Trinity Fitness
- the prevention and detection of crime and assisting investigations carried out by relevant authorities
- dealing with complaints

F. Automated decision making

Trinity Fitness does not make any automated decisions about you using your personal data.

G. Who we share your personal data with

Trinity Fitness will share the personal data of members with Harland Group who provide payment collection services to Trinity Fitness and the software used by Legend to administer memberships and block bookings. Our Technogym application is run by Technogym. Their contact details are:

Legend Club Management Systems (UK) Ltd. Marlborough House, Westminster Place, York. YO26 6RW.

Support 01904529575 info@legendware.co.uk

Legend is registered with the Information Commissioner's Office registration Z9255164.

Direct Debit agreements are administered on behalf of Trinity Fitness by: Harlands Services Ltd.
2nd Floor Rookwood House, 9-17 Perrymount Road, Haywards Heath
RH16 3TW
Helpline-01444449033 c.services@harlandsgroup.co.uk

Harlands Services Ltd is registered with the Information Commissioner's Office registration Z7017584.

Technogym administers the Technogym Application:
Technogym Application Technogym UK
Two The Boulevard Cain Road Bracknell
Berkshire RQ2 1WP
Support 01344 300236 Uk_service@technogym.com

Technogym Ltd is registered with the Information Commissioner's Office registration Z5731851

We will provide information to authorised government agencies and contact tracing schemes (such as NHS Test and Trace in England) in connection with COVID-19 or other crisis management scenarios.

H. Changes to your personal data

It is the responsibility of the customer to notify Trinity Fitness as soon as possible if any of the data held about them needs to be updated or is incorrect.

I. Will your data be sent or stored abroad?

Some of the personal data we process about you may be transferred to, and stored at, a destination outside the European Economic Area (EEA), for example where personal data is processed by one of our software suppliers who is based outside the EEA or who uses data storage facilities outside the EEA.

In these circumstances, your personal data will only be transferred where the transfer is subject to one or more of the appropriate safeguards for international transfers prescribed by applicable law (e.g. standard data protection clauses adopted by the European Commission); a European Commission decision provides that the country or territory to which the transfer is made ensures an adequate level of protection.

J. How long do we keep your personal data?

Trinity Fitness is required to only keep personal data as long as is necessary to fulfil the original intended use. After such point personal data should be deleted or archived. Trinity Fitness has established retention schedules of 6 Months which outline how long data will be retained for after the original intended use.

K. How you can access personal information Trinity Fitness holds about you and other rights you have

1. The right to be informed

You have the right to be informed about the collection and use of your personal data and this privacy notice is part of the transparency requirements of data protection legislation.

2. Right of access

You have a right of access to your own personal data held by Trinity Fitness. You can make a subject access request to see personal data held about you to do this please contact us in writing to:

Trinity Fitness
Leeds Trinity University
Brownberrie Lane
Horsforth
Leeds
LS18 5HD

3. The right to rectification

You have the right to have inaccurate personal data held by Trinity Fitness rectified, or completed if it is incomplete. This can be done contacting us at:

Trinity Fitness
Leeds Trinity University
Brownberrie Lane
Horsforth
Leeds
LS18 5HD

T: 0113 2837155

4. The right to erasure

Once personal data collected by Trinity Fitness is no longer necessary for the purpose for which it was collected and processed, you may have the right to have the data erased.

5. The rights to restrict processing and to object to processing

In certain circumstances you have the right to restrict the processing of your personal data. This is likely to arise when there is an issue concerning the accuracy or the legitimate grounds for processing of the personal data.

6. The right to object to processing

You have the right to object to:

- processing based on legitimate interests or the performance of a task in the public interest/exercise of official authority (including profiling);
- direct marketing (including profiling); and
- processing for purposes of scientific/historical research and statistics.

Trinity Fitness will stop processing the personal data unless there are compelling legitimate grounds for the processing, which override your interests, rights and freedoms.

7. Rights to data portability

You have the right to receive the personal data concerning you in a structured, commonly used and machine-readable format. Trinity Fitness will respond to any Subject Access Requests in compliance with this. This can be done by contacting us at Trinity Fitness, Leeds Trinity University, Brownberrie Lane, Horsforth, Leeds, LS18 5HD - 0113 2837155.

Note:

Detailed guidance on all of the rights you have with regard to the personal data that we hold and process about you is available on the ICO website here - <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/>.

L. Contact us

If you have any queries about this privacy notice or how we process your personal data you can contact us at:

Trinity Fitness
Leeds Trinity University
Brownberrie Lane
Horsforth
Leeds
LS18 5HD

T: 0113 2837155

M. Questions or concerns

If you have a concern about the way we are collecting or using your personal data, you should raise your concern with our Data Protection Officer. If you would like to report a data security breach (e.g. if you think your personal data has been lost or disclosed inappropriately) or if you would like to complain about how the University has used your personal data, please contact the University's Data Protection Officer at dataprotection@leedstrinity.ac.uk or write to

Data Protection Officer
Leeds Trinity University
Horsforth
Leeds
LS18 5HD

Should you be dissatisfied with our handling of your concerns, you have the right to complain to the Information Commissioner at <https://ico.org.uk/concerns/handling>.

N. Evaluation and review

This policy will be formally reviewed every year by the Data Protection Officer and the relevant department(s) within the University. In addition, the effectiveness of this Policy will be monitored as necessary on an on-going basis to ensure it is compliant with relevant legislation.

This policy was last updated in August 2020.