

## Data Collection and Privacy Policy

This statement explains how we collect, use, share and protect your personal information. When we update this Privacy Notice we will post any changes on our website. This policy is effective and updated as of 28 June 2023.

### WHO WE ARE

Ipswich Sports Club 2020 Limited, with registered office at Henley Road, Ipswich, IP1 4NJ, registered in England under Company No 12285852.

### INTRODUCTION

At Ipswich Sports Club (the “Club”) we are committed to protecting your privacy.

We collect and process personal data about you in order to provide the facilities and services you use; operate our business; meet our contractual and legal obligations; protect the security of our systems, our members, staff and our customers; or fulfil our other legitimate interests.

### WHEN DO WE COLLECT INFORMATION?

We collect your personal information when you:

- Complete an Online Guest or Membership Agreement
- Ask us for more information about our facilities or services, or contact us with a question or complaint
- Take part in a competition
- Visit or browse our website. See our Cookie Policy.
- Contact us through telephone or email or online enquiry
- Send an email to an @ipswichsports.co.uk email account
- Use your card or fob to enter into one of our locations
- You have an accident at our Club or there was an incident where you were a witness or personally affected
- When you use equipment in the gym
- When you book classes, courses and facilities
- CCTV – when you are using our Club. See our CCTV policy.
- When you use the PerfectGym member client portal or app
- When our teams take photos of your attendance at the gym, part of an event or in a class (Your permission will be asked beforehand)

We may also collect, match or acquire information about you from other organisations such as Google and Facebook.

### WHAT INFORMATION DO WE COLLECT?

The information we collect about you is required for the purpose of creating your Guest or Membership account and includes:

- Name, gender, date of birth, e-mail address, postal address, telephone number, health declaration

- Credit or debit card information, information about your bank account number and sort code or other banking information. Note that we do not store your bank or credit card details in our membership system, this is stored with our payment providers (Straal for credit cards, GoCardless for direct debits)
- Class, course and facility usage records and visits to the Club
- Details of purchases, dates of payments owed and received
- Notes of your contact with us via telephone or email
- Your marketing preferences

### HOW DO WE USE THIS INFORMATION?

We will use your personal information to provide you with the services, products or information that you have requested, for health and safety, security and administration purposes, to improve your website experience, and marketing. We may need to share your information with our service providers, associated organisations and agents for these purposes.

We may use your information to:

- Process your membership application through PerfectGym, our chosen membership software
- Charge you for using our services or facilities as part of your membership
- Keep you informed about our services or facilities including operational matters relating to your Membership
- Provide relevant services to you
- Confirm your booking for classes, courses or facilities
- To share information with our in-house sport leagues and competition software and court utilisation software
- To allow you to monitor your gym usage in your members area
- Contact you with offers or promotions based on our analysis of how you use our services and facilities and what we think will be of interest to you (unless you choose not to receive our marketing messages)
- Respond to any questions or concerns you might have about our services or facilities
- Understand how you use our services or facilities, to help us develop relevant and updated services and facilities
- Carry out research and statistical analysis to monitor how customers use our services and facilities
- Prevent and detect fraud or other crimes
- Operate our facilities in a safe and secure way
- In accordance with government guidelines (as in place from time-to-time) to prevent the spread of infection.

We will store your information for as long as you are a Member of the Club, or following cancellation of your membership and to meet our legal requirements including health and safety, financial audit, anti-fraud and money laundering regulations. We will store your information for no more than 6 years from the last activity on the account. An 'activity' can be classified as access to the Club, a payment made on the membership account or a comment added to the membership following contact with the Club. We may contact you about the Club services and facilities during this 6 years if you haven't opted out of receiving marketing communications from us.

## BASIS OF LAWFUL PROCESSING AND LEGITIMATE INTEREST

The Club relies on the following lawful bases for processing, storing and retaining your personal data:

You have chosen to become a member of ISC Club 2020 which is a sports club running leagues, competitions and social events as core business of the club. The competitive activities within the club can only function by members sharing some contact details and names.

In relation to your membership of the Club:

- your explicit and freely given consent for the specified purpose of membership and the use of Club services, sporting activities and facilities. This includes displaying your name on any bookings made within the court schedule tool.
- the processing is necessary for the performance of your membership contract with the Club
- the processing is necessary for a legal obligation that the Club is subject to
- the processing is necessary for the legitimate purposes of the Club or by a third party
- In relation to your personal data relating to your health
- processing is necessary for reasons of public interest in the area of public health
- processing is necessary to protect your vital interests

In relation to your retained data following termination of your membership:

- the processing is necessary for a legal obligation that the Club is subject to

In relation to marketing information

- the processing is necessary for the legitimate purposes of the Club or by a third party

## OPT OUT

The Club will only send you information relating to your membership. We will not share your data with any third parties for marketing purposes, unless you consent.

It is possible to opt out of name display on the booking and court schedule tools. This opt out will be captured in the administration process on joining the club or can be requested by emailing [membership@ipswichsports.co.uk](mailto:membership@ipswichsports.co.uk) . If you opt out of the name display your membership number will be displayed, but only staff members with the necessary role-based access will be able to see your linked details.

If you cancel your membership with the Club we will only send you information that we think will be of interest to you. If you want to opt out of receiving marketing messages from us, email [membership@ipswichsports.co.uk](mailto:membership@ipswichsports.co.uk) or click 'unsubscribe' at the bottom of any marketing correspondence you receive.

## DO WE USE COOKIES?

The Club uses cookies (small text files stored in your browser) and other similar technologies, such as web beacons (small, clear picture files used to follow your online activities) and server-side tagging. These collect information that tells us how you use our websites, web-related products and services. The use of cookies does not give us access to the rest of your computer.

This, in turn, helps us make our website relevant to your interests and needs. We may use a persistent cookie (a cookie that stays linked to your browser) to record your details so we can recognise you if you visit our website again.

You can choose to refuse cookies, or set your browser to let you know each time a website tries to set a cookie. You can find out more information about cookies including information on how to turn them off.

Please note however that if you disable our cookies you may not be able to access certain services or facilities on our site and your use of our site may be restricted. This could include joining or logging in to your members area. See our cookies policy.

### KEEPING YOUR PERSONAL INFORMATION SECURE

Our staff take appropriate measures to ensure that the information we collect and maintain is kept secure, accurate and up to date and kept only for so long as is necessary for the purposes for which it is used. Our staff have different levels of access appropriate to the services they provide – Role based Access control.

We ensure the organisations that provide us with services related to your membership have appropriate security measures and only process your information in the way we have authorised them to. These organisations will not be entitled to use your personal information for their own purposes.

### WILL WE DISCLOSE THE INFORMATION WE COLLECT TO OUTSIDE PARTIES?

We may share information about you with:

- Service providers, agents and associated organisations to allow us to service your membership and communicate with you; for example, financial institutions to process payments, and coaches or trainers when you sign up to courses or classes
- Law enforcement agencies, regulatory organisations, courts or other public authorities where we have a legal obligation to do so
- Government authorities to prevent the spread of infection around the UK

We will release information if it is reasonable for the purpose of protecting us against fraud, defending our rights or property, or to protect the interests of our customers.

### THIRD PARTY TRACKING

We use tools such as Google Analytics for collecting personal data about our website visitor's online activities over time and across different web sites for marketing purposes. This is so we can ensure our website gives you the best possible experience. For more information and how to opt out from this please visit our cookies policy.

### YOUR PRIVACY RIGHTS

You have the following rights in relation to your data privacy: the right of access; the right of rectification; the right of erasure (the "right to be forgotten"); the right to restriction of processing; the right to be notified; the right to data portability; the right of objection; and the right to not be subject to automated profiling.

- **Access.** You have the right to ask for a copy of the information we hold about you and to

have any inaccuracies in your information corrected. Please contact us through email to [datarequest@puregym.com](mailto:datarequest@puregym.com) , the contact us section of the website or writing to the address below. There is not normally a fee for this service.

- **Rectification.** If you believe we are holding inaccurate information about you, or your personal details change, please update your profile on the PureGym website in the members' area. Debit, Credit and Bank account changes can be made in your members' area on the PureGym website.
- **Erasure.** You have the right to the erasure of the data we hold on you, when it is no longer needed for the purposes of your Membership, or when you withdraw your consent for our processing (and we have no other lawful basis to hold your data).

The address to be used to obtain a copy of your personal information is:

Ipswich Sports Club 2020 Limited, Henley Road, Ipswich, IP1 4NJ.

You can also contact us by emailing [clubsecretary@ipswichsports.co.uk](mailto:clubsecretary@ipswichsports.co.uk) .

### CHANGES TO THIS PRIVACY NOTICE

We will update this privacy notice to reflect the way in which we process and protect your data. If we do so, we will post notice of the change on our website and you will have the opportunity to adjust your communications preferences accordingly.

### IDENTITY OF DATA CONTROLLER

Ipswich Sports Club 2020 Limited is registered with the Information Commissioner's Office (the 'ICO') as a data controller under registration reference Z\*\*\*\*\*.