

This Privacy Policy relates to customer data processed and stored by The Holbrook Club Ltd it includes data captured on our website www.theholbrookclub.co.uk

The Holbrook Club, is the data controller and is registered with the Information Commissioner's Office. This Privacy Policy informs customers and users about the collection, use and sharing of personal information we collect on our websites, on our App, at our club, and through the various services we offer.

This Privacy Policy is designed to protect you, our users by informing you how personal information is collected, how we look after that information and with whom we share it.

The Holbrook Club is committed to complying with the Data Protection Act 1998, the General Data Protection Regulation (GDPR) from 25th May 2018 and The Privacy and Electronic Communications (EC Directive) Regulations 2003. By using our website, our club and other services, you are consenting to us processing your information in the ways stated here.

What information do we collect and why?

The basis on which we collect and process your data is usually through *consent*. Sometimes there is a *contractual* reason such as being able to process a monthly direct debit payment. Occasionally there may be a *legal* reason for collecting data, such as for employees when we have to collect the information for the HMRC, or, should you have an accident, we may need to provide details of this to the relevant health and safety authorities. We may also process your data based on our legitimate business interests for example in order to operate and improve our business.

The information we collect may include any of the following:

Any personal details you give us or we obtain from third parties.

Information you type into our websites or provide to one of our colleagues such as when you become a member, create your profile, update your member profile, provide activity data from other devices, make a booking, sign up as a volunteer, visit one of our club or attend any of our events. This information may include your personal contact data, fitness-related data which has been obtained in order to create personalised fitness workouts for you or health related data. We use this to provide you with the services you request, tell you about services you are eligible for, to keep in contact with you, manage your account and the services we provide. If you contact us by email, via the website, in person or by telephone we may keep a record of your contact information and enquiry and may subsequently use your contact details to respond to your enquiry.

Information which allows us to recognise you.

Such as a unique ID number; storing this data saves you from re-entering your details again when you return to the website. Everyone Active can recognise you by your photograph as well, which also allows us to ensure that your card is not misused if lost or stolen and helps us identify you to ensure we support you on your member journey.

Details of your transactions.

We collect data for any transactions you carry out through our websites and services, so that we can administer the services you have with us. Please note that we never store your payment details on our website.

Details of your transactions.

Sensitive Health Data

We collect any personal health data you provide to us when registering and signing up for our services. We collect this information to ensure we are offering you the right services and so your progress can be tracked by yourself and us. We may ask you for information about your health in order to recommend appropriate exercise regimes or offer our other services.

Banking data

We will store your bank account number and sort code data where you have a Direct Debit mandate in place. When the Direct Debit mandate finishes we will remove this data from our operational systems within 30 working days.

We process bank card information at the time we take payment. This data is not stored on our systems and is processed on Payment Card Industry Data Security Standard compliant banking systems.

Information about website visits including IP address.

The IP address is your computer's individual identification number.

We use your IP address to capture information about website visits so we can learn more about how our customers use the website in order to find ways to improve the website and our products and services for your benefit.

Customer feedback

We will record customer comments, Net Promoter Scores (NPS) and surveys about how we are performing

Other Sensitive data

We are sometimes required to collect information about your ethnicity and other sensitive data in order to provide aggregated reports to local authority, Sport England or similar organisation. This information is used only for statistical purposes and is always kept secure. If you prefer not to provide us with this data we will not hold this data.

Your communications preferences.

We keep a record of any permissions and preferences you give us about what types of communication you are happy to receive from us.

Data relating to children

Children aged under 16 years must have a parent or guardian's consent before providing personal information to us. We do not wish to collect any personal information without this consent.

How do we store and protect your personal information?

These are the basic guidelines we use to look after your personal data.

- We maintain secure systems to protect your personal information
- We respect your wishes about how we contact you, whether by post, telephone, email or text message
- We will update your information or preferences promptly when you ask us to
- We will respond fully to requests from you to see the information that we hold on you.
- We will not hold your personal information for longer than is necessary for our legitimate business purposes.
- We follow strict procedures when storing or handling information that you have given us. Some information is encrypted, such as payment transactions and password.
- We will never sell your personal information to a third party.

The Holbrook Club reserves the right to store and process information securely outside of the European Economic Area (“EEA”).

Retention Policy

We retain personal information as long as we consider it useful to contact you, or as needed to comply with our legal obligations. Where data is not needed for legal or statutory purposes we will delete this information if you request. See the contacts section to request your data to be deleted.

Services provided by contracted third parties

The Holbrook Club may share information with third party organisations that provide specific services on our behalf which enhance our products and your experience with us. These organisations act as a Data Processor under our instructions. They may process data securely outside of the EEA. There is a contract in place with each third party which includes strict terms and conditions to protect your privacy.

Our current processing partners include The Retention People (TRP), Legend Club and Access Pay

Marketing Partners

The Holbrook Club will never sell your personal information to any third party for marketing or other purposes.

In some cases, The Holbrook Club works in partnership with another organisation to provide services to you. In these cases, the partner may contact you for marketing purposes if you have given the partner organisation your permission to do so. The Holbrook Club partners who fall into this category are:

- The Holbrook Club Junior Tennis.

How do we use your information?

We use your information to help us provide and improve our services for you. We may use your information in the following ways.

- to provide you with any services that you have purchased or receive as a user of the clubs facilities
- to check your identity

- to check your eligibility where appropriate
- to update our records with any new information you give us
- to notify you if we will be unable to provide a service you have booked before
- to provide marketing communications (if you have given us your permission)
- for research and analysis so we can develop and improve our services for your benefit
- to tailor our communications to you to ensure relevance (if you do not want us to do this please contact us using the details below)
- to comply with legal requirements.
- To safeguard users of our services

Keeping you updated

There are certain communications we need to send to you so we can provide our services. We call these service communications and include for example notices about your direct debit payments, change of password, registration confirmations, appointment reminders and waiting list announcements. We would not be able to provide you with services if we did not send these.

We may from time to time contact you about our services or products we think you might find interesting by email, by post, telephone or SMS, but only if you have given us your permission to do so.

If you do not want us to contact you other than for service emails let us know when you next visit us or contact us using the details below.

Your rights to manage your personal data

Accuracy of data

We will always try to ensure the data we hold about you is accurate and relevant. If you believe the information we hold about you is out of date or incorrect, please tell a member of staff or see the contacting us section below. You will need a form of identification to request any changes.

Seeing your data – subject access request

The Data Protection Act 1998 and the General Data Protection Regulation give you the right to know what personal information we hold about you. This is called a Subject Access Request. If you would like to make a request you should write to the Data Controller – see contacting us section.

Removing your data

If you no longer use our services and products and wish us to delete your personal data we will do this if there are no legal or statutory regulations requiring us to keep this information. Please write to the Data Controller – see contacting us section.

Restricting processing

You can contact us using the details below to restrict the processing of your data including some processing we do under legitimate business interests.

Complaints about how we manage your data

If you are not happy about the way we manage your data please contact us as quickly as possible by contacting us on 01403 751150 or email us on office@theholbrookclub.co.uk. You may also write to the Data Controller – who will investigate your complaint and get back to you as soon as possible.

Information Commissioner's Office (ICO)

The ICO is the UK's independent authority set up to uphold information rights. You have the right to contact them should you wish. Details can be found on their website: <https://ico.org.uk/>

Links to other websites

Our websites may contain links to and from external websites, advertisers and affiliates. If you follow a link to other sites please note that these will be governed by their own privacy policies. We cannot accept liability for data use on those websites.

Changes to this privacy policy

This policy may be updated from time to time on this page. If you have any questions or comments about our Privacy Policy or how we use your personal information please contact us at office@theholbrookclub.co.uk

Contacting us

You can write or email our Data Controller office@theholbrookclub.co.uk

Data Controller
The Holbrook Club
North Heath Lane
Horsham
West Sussex
RH12 5PJ