



## Privacy Notice / Policy

### **Who We Are**

The Summit Leisure Clubs Ltd trading as The Fitness Experts ('we' or 'us' or 'our') gather and process your personal information in accordance with this privacy notice and in compliance with the relevant data protection Regulation and laws. This notice provides you with the necessary information regarding your rights and our obligations, and explains how, why and when we process your personal data.

The Fitness Experts registered office is at 447 Kenton Road, Harrow, Middlesex, HA3 0XY and we are a company registered in England and Wales under company number 07598734 and act as the data controller when processing your data.

### **Information That We Collect**

The Fitness Experts processes your personal information to meet our legal, statutory and contractual obligations and to provide you with our products and services. We will never collect any unnecessary personal data from you and do not process your information in any way, other than as specified in this notice.

#### ***The personal data that we collect from is: -***

- Name
- Date of Birth
- Home Address
- Personal Email
- Business Email
- Home Telephone Number
- Mobile Telephone Number
- Bank account details
- Special Category Data (*i.e. health/medical information, interests*)

#### ***We collect information in the below ways: -***

Membership forms, Information forms, Online forms, website forms and orders, employment CV's

### **How We Use Your Personal Data (Legal Basis for Processing)**

The Fitness Experts takes your privacy very seriously and will never disclose, share or sell your data without your consent; unless required to do so by law. We only retain your data for as long as is necessary and for the purpose(s) specified in this notice. Where you have consented to us providing you with promotional offers and marketing, you are free to withdraw this consent at any time. ***The purposes and reasons for processing your personal data are detailed below: -***

- *We collect your personal data in the performance of a contract or to provide a service*



- *We collect and store your personal data as part of our legal obligation for business accounting*
- *We will occasionally send you marketing information where we have assessed that it is beneficial to you as a customer or prospective member and in our interests. Such information will be non-intrusive and is processed on the grounds of legitimate interests*

## **Your Rights**

You have the right to access any personal information that The Fitness Experts processes about you and to request information about: -

- What personal data we hold about you
- The purposes of the processing
- The categories of personal data concerned
- The recipients to whom the personal data has/will be disclosed
- How long we intend to store your personal data for
- If we did not collect the data directly from you, information about the source

If you believe that we hold any incomplete or inaccurate data about you, you have the right to ask us to correct and/or complete the information and we will strive to do so as quickly as possible; unless there is a valid reason for not doing so, at which point you will be notified.

You also have the right to request erasure of your personal data or to restrict processing (*where applicable*) in accordance with the data protection laws; as well as to object to any direct marketing from us. Where applicable, you have the right to data portability of your information and the right to be informed about any automated decision-making we may use.

If we receive a request from you to exercise any of the above rights, we may ask you to verify your identity before acting on the request; this is to ensure that your data is protected and kept secure.

## **Safeguarding Measures**

The Fitness Experts takes your privacy seriously and takes every reasonable measure and precaution to protect and secure your personal data. We work hard to protect you and your information from unauthorised access, alteration, disclosure or destruction and have several layers of security measures in place, including: - SSL, restricted access, IT authentication, firewalls, anti-virus/malware protection.

## **Transfers Outside the EU**

The Fitness Experts utilise some products or services (*or parts of them*) that may be hosted/stored in non-EU countries, which means that we may transfer any information which is submitted by you through the website outside the European Economic Area ("EEA") for the below purposes: - Including, Moonclerk, Stripe, Zoho, Unbounce, Rotacloud, Survey Monkey, Dropbox, Formstack, Facebook, Instagram.



Therefore, when you use our website/send us an email/sign up to our newsletter, sign up for a trial or membership the personal information you submit may be stored on servers which are hosted in non-EU countries. Where this is the case, we will take steps to ensure that those providers use the necessary level of protection for your information and abide by strict agreements and measures set out by The Fitness Experts to protect your data and comply with the relevant data protection laws.

### **Legitimate Interests**

As noted in the 'How We Use Your Personal Data' section of this notice, we occasionally process your personal information under the legitimate interests' legal basis. Where this is the case, we have carried out a thorough Legitimate Interests' Assessment (LIA) to ensure that we have weighed your interests and any risk posed to you against our own interests; ensuring that they are proportionate and appropriate.

We use the legitimate interests' legal basis for processing data for anyone that has given their details to us who have shown interest in a trial, short term membership, membership, ex members and have identified that our interests are aligned and you are interested in what you have enquired about in relation to promotions, offers and benefits.

### **How Long We Keep Your Data**

The Fitness Experts only ever retains personal information for as long as is necessary and we have strict review and retention policies in place to meet these obligations. We are required under UK tax law to keep your basic personal data (*name, address, contact details and account details*) for a minimum of 6 years after which time it will be destroyed.

Where you have consented to us using your details for direct marketing, we will keep such data until you notify us otherwise and/or withdraw your consent.

We will keep members data for the duration of being a member and 6 years thereafter  
We will keep prospective and ex members data until you withdraw your consent

We will keep ex members data for 18 months unless you withdraw your consent.

### **Special Categories Data**

Owing to the products, services or treatments that we offer, The Fitness Experts sometimes needs to process sensitive personal information (*known as special category data*) about you, like a pre-exercise questionnaire, lifestyle questionnaire, medical information, doctor notices. Where we collect such information, we will only request and process the minimum necessary for the specified purpose and identify a compliant legal basis for doing so.

### **Cookie Notice**

A '*cookie*' is a small piece of data sent from a website and stored on the user's computer by the user's web browser while the user is browsing. When you visit a site that uses cookies for the first time, a



cookie is downloaded onto your computer/mobile device so that the next time you visit that site, your device will remember useful information such as items added in the shopping cart, visited pages or logging in options.

Cookies are widely used in order to make websites work, or to work more efficiently, and our site relies on cookies to optimise user experience and for features and services to function properly.

Most web browsers allow some control to restrict or block cookies through the browser settings, however if you disable cookies you may find this affects your ability to use certain parts of our website or services. For more information about cookies visit <https://www.aboutcookies.org>.

### **Social Media**

We advise Members and visitors to ensure that if they are to take photos or record video on the premises, that no other individual appears in the footage. We do occasionally arrange filming or photographs for use on our Social Media or other communications. All due care will be taken to ensure that no one appears in filming or content created by us without expressing active consent to be included. If you find you do appear in error, and would like an image or video of you to be removed from our Social Media channels or communication please contact us immediately

### **Lodging A Complaint**

The Fitness Experts only processes your personal information in compliance with this privacy notice and in accordance with the relevant data protection laws. If, however you wish to raise a complaint regarding the processing of your personal data or are unsatisfied with how we have handled your information, you have the right to lodge a complaint with the supervisory authority.

### **Summit Leisure Clubs Ltd**

**Tom Edwards**

**The Fitness Experts , 447, Kenton Road, Harrow, Middlesex, HA30XY**

