



WYE LEISURE PRIVACY POLICY

This document explains how we use your personal data.

Wye Leisure Limited is the data controller in respect to all personal data collected at Wye Leisure and on its website <http://www.wyeleisure.co.uk/>.

We are committed to ensuring the privacy of our, visitors, members, partners and other website visitors. In this policy we explain how we hold, process and retain your personal data.

1. How we use your personal data

1.1 This section provides you with information about:

- (a) what personal data we hold and process;
- (b) in respect of personal data that we did not collect from you directly, where we obtained that data from, and what types of data we have collected;
- (c) the purposes for which we may process your personal data; and
- (d) the legal grounds on which we process your data.

We will not pass on your information to any third party without your explicit consent.

1.1. **Contact data.** We may process information that you provide to us ("**contact data**"). This contact data may include your name, address, telephone number, email address, home address and postcode, and may be provided to us in person, through our contact or consultation forms or through our website. We may use this contact data during the course of providing our services, in conjunction with our partner and suppliers, to you. The legal basis for this processing is for the purposes of performing our contract with you, or in taking steps at your request prior to entering into a contract.

Where you have provided your consent for us to do so, we may contact you by email regarding the latest promotions and offers regarding our products and services, and those of our partner organisations, and to send you newsletters.

1.2. **Enquiry data.** We may process information contained in any enquiry you submit to us regarding our membership packages, spa treatments and services ("**enquiry data**"), including on our website contact pages, on social media, by telephone, or in person. The enquiry data may be processed for the purposes of offering, marketing and selling relevant products and/or services to you.

The legal basis for this processing is our legitimate interests in responding to your enquiry appropriately.

1.2. **Transaction data.** We may process information relating to any payments made by you to us ("**transaction data**"). The transaction data may include your contact details, your bank account details, and the transaction



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details. The transaction data may be processed for the purposes of processing these payments and keeping proper records of those transactions.

The legal basis for this processing is the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract and our legitimate interests, namely our interest in the proper administration of our website and business.

- 1.3 **Website data.** We may process data about your use of our website and services ("**website data**"). The website data may include your IP address, geographical location, browser type and version, operating system, referral source, length of visit, page views and website navigation paths, as well as information about the timing, frequency and pattern of your service use. The source of the website data is our analytics tracking system. This website data may be processed for the purposes of analysing the use of the website and services.

The legal basis for this processing is our legitimate interests, namely monitoring and improving our website and services.

- 1.4 **Wi-Fi data.** We may collect data about your use of our Wi-Fi service ("**Wi-Fi data**"). The Wi-Fi data may include details about Internet searches you have carried out whilst connected to our Wi-Fi, your MAC address, IP address, and device name. This data may be collected during the process of your using the Internet whilst connected to our Wi-Fi. We will only access and use this Wi-Fi data in order to administer our Wi-Fi service and overall IT system, and for diagnostic purposes. We may pass your data to Cisco Meraki who provide us with IT services. They will only process the data that we pass to them for administration, technical, and diagnostic purposes.

The legal basis for this processing is our legitimate interests in properly providing and administering our Wi-Fi service, and protecting our IT systems.

Your Wi-Fi data may also be accessed and processed by Facebook, although we will never actively transfer data to Facebook. This is because when you connect to our Wi-Fi service, you do so through Facebook. The way in which Facebook accesses and processes your personal data may depend on your Facebook account settings and browser configuration. This will be subject to Facebook's Wi-Fi Terms which are accessible via Facebook, and also Facebook's privacy policies.

- 1.5 **Member data.** If you take out one of our membership packages, we may process information that you provide to us ("**member data**"). This member data may include your name, home address and postcode, telephone number, email address, date of birth, gender, a photograph of you, date of birth, credit or debit card details, bank account details, demographic information such as preferences and interests, CCTV imagery and information contained within images or texts that you send us which may contain locational data, and may be provided to us in person, through one of our contact or consultation forms.

We may use this data to provide you with pricing information, for administering your account(s) with us, and for providing our services to you. The member data may also be processed during the course of your use of the services that we provide, and for the purposes of administering and renewing your membership,



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performing our contract with you, or in taking steps at your request prior to entering into a contract. Your data may also be anonymised for the purposes of our analysing and monitoring trends in activity.

We may also ask for relevant health and long term injury information, information about any disability you may have and other important medical information for the purposes of fitness and health checks and the safe delivery of activities and spa treatments you engage in. This data is a special category of personal data and we will only process it with your explicit consent for agreed purposes at the point of collecting it.

The consent to use this information needs to be provided by the parent for children under the age of 13. Anyone over the age of 13 can provide consent for use of their data under GDPR.

Where you have provided your consent for us to do so, we may contact you by email regarding the latest promotions and offers regarding our gift cards and services, and to send you newsletters.

- 1.6 **Notification data.** We may process information that you provide to us for the purpose of subscribing to our newsletters ("**notification data**"). The notification data may include your name, email address, date of birth and gender and may be processed for the purposes of sending you our newsletters.

The legal basis for this processing is consent.

- 1.7 **Correspondence data.** We may process information contained in or relating to any communication that you send to us, or that we send to you ("**correspondence data**"). The correspondence data may include the communication content and metadata associated with the communication. Our website will generate the metadata associated with communications made using our contact forms. The correspondence data may be processed for the purposes of communicating with you and record-keeping.

The legal basis for this processing is our legitimate interests, namely the proper administration of our website and business and communications with users.

- 1.8 **Competition data.** You may provide us with your details if you wish to enter one of our competitions. This data may include your title, name, email address, home address and post code, telephone number, date of birth and your demographic information such as preferences and interests. We may process this personal data for the purposes of processing your application to the competition.

The legal basis for this processing is our legitimate interests in ensuring the proper running and administration of our competitions

- 1.9 **CCTV data.** We may also process information such as your photographic image which may be captured by our CCTV systems ("**CCTV data**"). The legal basis for this processing is our legitimate interests in maintaining the security of our premises and ensuring the safety of our members, visitors, and staff.

- 1.10 **Other processing activities.** In addition to the specific purposes for which we may process your personal data set out above, we may also process any of your personal data where such processing is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.



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1.11 Please do not supply any other person's personal data to us, unless we prompt you to do so or have entered into a written data processing agreement with you.

2. Providing your personal data to others

2.1 **Our partner service providers.** We may share your data to our partners who manage and support us such as Global Payments Limited, Technogym UK Limited, SysTeam GmbH, Vitalis Internet Business Builders and Communicate Better Limited. We may also share your data with other companies within our group of companies.

We may use third party service providers to help us operate our business and our web site or administer activities on our behalf. We may share your information with these third parties for those limited purposes provided that you have given us your permission.

2.2 **Our insurers/professional advisers.** We may disclose your personal data to our insurers and/or professional advisers insofar as reasonably necessary for the purposes of obtaining and maintaining insurance coverage, managing risks, obtaining professional advice and managing legal disputes.

2.3 **Social Media Platforms.** We operate the following social media pages Facebook, Twitter, Instagram and Google+. If you join one of our Social Media pages, please note that the provider of the social media platforms have their own privacy policies and we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data on our social media pages.

2.4 **Where we provide your personal data to any third party.** Where we share your personal data with any third party, we will ensure this processing is protected by appropriate safeguards including a suitable data processing agreement with that third party.

2.5 **To comply with legal obligations.** In addition to the specific disclosures of personal data detailed above, we may also disclose your personal data where such disclosure is necessary for compliance with a legal obligation we have to comply with, or in order to protect your vital interests or the vital interests of another individual.

3. Transfers of your personal data outside of the European Economic Area

We may transfer your personal data to our partners outside of the EEA. Where we do so, we will ensure that either (a) The European Commission has made an "adequacy decision" with respect to the data protection laws of the country to which it is transferred, or (b) we have entered into a suitable data processing agreement with the third party situated in that country to ensure the adequate protection of your data. In all cases, transfers outside of the EEA will be protected by appropriate safeguards.

4. Retaining and deleting personal data

4.1 Personal data that we process for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes, unless we contact you and obtain your consent for us to retain your personal data for a longer period.



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- 4.2 Your basic contact data will be retained in our main contact database. Other data that you provide to us may be held in other databases relating to bookings and your fitness and health, which will be deleted at regular intervals but may be held for up to a year.
- 4.3 Other data of yours that we may collect (such as enquiry, correspondence, notification, competition, website and Wi-Fi data) will be held for up to 2 years following the date of our last contact or dealing with you, at the end of which period it will be deleted. Transaction data may be held for up to 5 years for legal reasons.
- 4.4 CCTV data will normally be retained for 3 months from the date of capture. However we may need to retain such data for longer to ensure the security of our premises, and to deal with the legal implications of specific incidents that may occur on our premises for example involving theft, violence or injury.
- 4.5 We may retain your personal data where such retention is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.

5. Amendments

- 5.1 We may update this policy from time to time by publishing a new version on our website.
- 5.2 You should check this page occasionally to ensure you are happy with any changes to this policy.
- 5.3 We may notify you of changes to this policy by email.

6. Your rights

- 6.1 You may instruct us to provide you with any personal information we hold about you; provision of such information will be subject to:
- (a) your request not being found to be unfounded or excessive, in which case a charge may apply; and
 - (b) the supply of appropriate evidence of your identity (for this purpose, we will usually accept a photocopy of your passport certified by a solicitor or bank plus an original copy of a utility bill showing your current address).
- 6.2 We may withhold personal information that you request to the extent permitted by law.
- 6.3 The rights you have under data protection law are:
- (a) the right to access;
 - (b) the right to rectification;
 - (c) the right to erasure;
 - (d) the right to restrict processing;
 - (e) the right to object to processing;



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- (f) the right to data portability;
 - (g) the right to complain to a supervisory authority; and
 - (h) the right to withdraw consent.
- 6.4 **Your right to access your data.** You have the right to ask us to confirm whether or not we process your personal data and, to have access to the personal data, and any additional information. That additional information includes the purposes for which we process your data, the categories of personal data we hold and the recipients of that personal data. You may request a copy of your personal data. The first copy will be provided free of charge, but we may charge a reasonable fee for additional copies.
- 6.5 **Your right to rectification.** If we hold any inaccurate personal data about you, you have the right to have these inaccuracies rectified. Where necessary for the purposes of the processing, you also have the right to have any incomplete personal data about you completed.
- 6.6 **Your right to erasure.** In certain circumstances you have the right to have personal data that we hold about you erased. This will be done without undue delay. These circumstances include the following: it is no longer necessary for us to hold those personal data in relation to the purposes for which they were originally collected or otherwise processed; you withdraw your consent to any processing which requires consent; the processing is for direct marketing purposes; and the personal data have been unlawfully processed. However, there are certain general exclusions of the right to erasure, including where processing is necessary: for exercising the right of freedom of expression and information; for compliance with a legal obligation; or for establishing, exercising or defending legal claims.
- 6.7 **Your right to restrict processing.** In certain circumstances you have the right for the processing of your personal data to be restricted. This is the case where: you do not think that the personal data we hold about you is accurate; your data is being processed unlawfully, but you do not want your data to be erased; it is no longer necessary for us to hold your personal data for the purposes of our processing, but you still require that personal data in relation to a legal claim; and you have objected to processing, and are waiting for that objection to be verified. Where processing has been restricted for one of these reasons, we may continue to store your personal data. However, we will only process it for other reasons: with your consent; in relation to a legal claim; for the protection of the rights of another natural or legal person; or for reasons of important public interest.
- 6.8 **Your right to object to processing.** You can object to us processing your personal data on grounds relating to your particular situation, but only as far as our legal basis for the processing is that it is necessary for: the performance of a task carried out in the public interest, or in the exercise of any official authority vested in us; or the purposes of our legitimate interests or those of a third party. If you make an objection, we will stop processing your personal information unless we are able to: demonstrate compelling legitimate grounds for the processing, and that these legitimate grounds override your interests, rights and freedoms; or the processing is in relation to a legal claim.
- 6.9 **Your right to object to direct marketing.** You may instruct us at any time not to process your personal information for marketing purposes.



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In practice, you will usually either expressly agree in advance to our use of your personal information for marketing purposes, or we will provide you with an opportunity to opt out of the use of your personal information for marketing purposes.

You can object to us processing your personal data for direct marketing purposes. If you make an objection, we will stop processing your personal data for this purpose.

- 6.10 **Your right to object for statistical purposes.** You can object to us processing your personal data for statistical purposes on grounds relating to your particular situation, unless the processing is necessary for performing a task carried out for reasons of public interest.
- 6.11 **Automated data processing.** To the extent that the legal basis we are relying on for processing your personal data is consent, and where the processing is automated, you are entitled to receive your personal data from us in a structured, commonly used and machine-readable format. However, you may not have this right if it would adversely affect the rights and freedoms of others.
- 6.12 **Complaining to a supervisory authority.** If you think that our processing of your personal data infringes data protection laws, you can lodge a complaint with a supervisory authority responsible for data protection. You may do this in the EU member state of your habitual residence, your place of work or the place of the alleged infringement.
- 6.13 **Right to withdraw consent.** To the extent that the legal basis we are relying on for processing your personal data is consent, you are entitled to withdraw that consent at any time. Withdrawal will not affect the lawfulness of processing before the withdrawal.
- 6.14 **Exercising your rights.** You may exercise any of your rights in relation to your personal data by written notice to us in addition to the other methods specified above.

7. Cookie Policy

For information about how we use Cookies please see our Cookie Policy at www.wyeleisure.co.uk/downloads/Cookie_Policy.pdf

8. Links to other websites

This Privacy Statement applies solely to personal data collected by us. Our website may contain links to external sites, operated by other owners and third parties, over which we have no control. For this reason, we encourage our visitors to be aware when they leave our website to read their privacy policy applicable. Any access to such other websites or pages is entirely at your own risk. We are not responsible for the privacy policies, content or security of any third-party websites linked to our website.

9. Our details

- 9.1 This website is owned and operated by Wye Leisure Limited
- 9.2 We are registered in England and Wales under registration number 03926356 and our registered office is at Wye Leisure, Fownhope, Hereford, Herefordshire, HR1 4PE.



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9.3 You can contact us:

- (a) by post, using the postal address given above;
- (b) using our website contact form;
- (c) by telephone, on the contact number published on our website from time to time; or
- (d) by email, using the email address published on our website from time to time.

10. Privacy officer

Our privacy officer's contact details are: Thomas Williams who can be contacted via email: dataofficer@wyeleisure.com or telephone: 01432 860860.