

## The Hawthorns Sports Centre Privacy Notice

### **General Statement of the Sports Centre's Duties**

This Privacy Notice governs the manner in which The Hawthorns School Sports Centre ("the Sports Centre") will collect, use (or "process"), maintain and disclose personal information ("data") collected from users of the Sports Centre Website (<https://www.hawthornssportscentre.com>). This Privacy Notice applies also all products and services offered by the Sports Centre to members of, or visitors to, the Sports Centre.

### **Key aims**

The Sports Centre is required to protect all members of its community's right to privacy in line with the relevant legislation ("Data Protection Law"). The relevant legislation includes the General Data Protection Regulation (EU 2016/679) and the UK Data Protection Act 2018, as well as other potentially supporting legislation.

Staff, users and members are all encouraged to read this Privacy Notice. This Privacy Notice applies alongside any other information the Sports Centre may provide about a particular use of personal data, for example when collecting data via a paper form.

Hard copies of this Privacy Notice are available from the Sports Centre Office and an electronic version is on the website.

Associated policies pertaining to The Hawthorns School ("the School") should be read as applying equally to the Sports Centre.

### **Responsibility for Data Protection**

The School has appointed a Compliance and Privacy Officer ([compliance@hawthorns.com](mailto:compliance@hawthorns.com)) who will deal with all your requests and enquiries concerning the School's uses of your personal data and endeavour to ensure that all personal data is processed in compliance with this Notice and Data Protection Law.

- The Bursar is the responsible member of the School's Leadership Team for Data Protection.
- A governor with oversight of this policy is Rob Buckingham ([Rob.Buckingham@search.co.uk](mailto:Rob.Buckingham@search.co.uk))
- The School entity has been appointed as the Data Controller for the purposes of the legislation.
- You can also contact the School by post to The Hawthorns School, Pendell Court, Bletchingley, Surrey RH1 4QJ or by telephone on 01883 743048.

### **Why the Sports Centre needs to process personal data**

In order to carry out its ordinary duties to staff and users, the Sports Centre may process a wide range of personal data about individuals (including current, past and prospective staff, or users) as part of its daily operation.

The Sports Centre will need to carry out some of this activity in order to fulfil its legal rights, duties or obligations – including those under a contract with its staff.

Other uses of personal data will be made in accordance with the Sports Centre's legitimate interests, or the legitimate interests of another, provided that these are not outweighed by the impact on individuals and provided it does not involve special or sensitive data.

### **The types of personal data we collect**

We may collect the following types of personal data about you:

- Users will be asked for, as appropriate, name, email address, mailing address, phone number. Users may, however, visit our Site anonymously.

- Certain other information which you volunteer when making use of your membership benefits (for example, when making court bookings or making use of other Sports Centre facilities).

Whilst we do not generally collect sensitive personal data, we do specifically collect health data which will help with your particular needs. By volunteering this information, you are consenting to us using it in the manner set out in this Privacy Notice.

### **How we collect your personal data**

We may collect personal data from users in a variety of ways, including, but not limited to, when users visit our site, place an order, subscribe to our newsfeed, respond to a survey, fill out a form, and in connection with other activities, services, features or resources we make available on our Site.

When you contact the Sports Centre via the website, email, post, phone or SMS, we collect, store and use certain information which you disclose to us. This may include name, address, telephone email or mobile number and other communication data. If you contact us, we may keep a record of that communication.

### **How we use personal data**

Personal data provided to us will be used for the purposes set out at the time of collection and, where relevant, in accordance with any preferences you express.

We may collect and use user's personal information for the following purposes:

- To improve customer service: information you provide helps us respond to your customer service requests and support needs more efficiently.
- To personalise the user's experience
- We may use information in the aggregate to understand how our users as a group use the services and resources provided on our Site.
- To improve our Site
- We may use feedback users provide to improve our products and services.
- To send periodic emails
- We may use the email address to send user information and updates pertaining to their recent attendances. It may also be used to respond to their inquiries, questions, and/or other requests relating solely to the use of the Sports Centre

### **Cookies**

Cookies are small text files placed on a visitor's computer to "remember" their visit. They are used for all sorts of things from remembering goods in a basket to speeding up the process of leaving blog comments. They are also used by analytics software to give the Sports Centre important information about visitor numbers, pages viewed and so on. More information about cookies can be found at [www.whatarecookies.com](http://www.whatarecookies.com)

The Sports Centre uses cookies and similar technologies on its website to improve performance and make visitors' experience better. Traffic log cookies are used to identify which pages are being viewed. This can help the School analyse data about webpage traffic and improve the website in order to tailor it to customer needs. This information is only used for statistical analysis purposes.

Overall, cookies help the Sports Centre provide visitors with a better website by enabling it to monitor which pages are found useful and which are not. A cookie in no way gives us access to a

visitor's computer or any information about the visitor, other than the data that visitors choose to share on the website. None of the cookies are used to record personal data.

Visitors can choose to accept or decline cookies. Most web browsers automatically accept cookies, but browser settings can be modified to decline cookies if preferred. This may prevent visitors from taking full advantage of the website.

Below are shown the cookies that are used in the Sports Centre website:

Cookie Name	Purpose and Content
_ga	<p><b>Type</b> Analytics/performance cookie</p> <p><b>Purpose</b> Used to distinguish users and sessions when they connect to the website</p> <p><b>Content</b> Randomly generated number</p> <p><b>Provider</b> Google Analytics</p> <p><b>Expiry</b> 2 Years</p>
Hawthorns_pop_*POPUENAME*	<p><b>Type</b> Popup management cookie</p> <p><b>Purpose</b> Used to store whether user has seen a pop-up message</p> <p><b>Content</b> Randomly generated number</p> <p><b>Provider</b> Concept4</p> <p><b>Expiry</b> 2 Weeks</p>
CFID CFTOKEN	<p><b>Type</b> Tracking</p> <p><b>Purpose</b> Used to distinguish users and sessions when they connect to the website</p> <p><b>Content</b> Randomly generated number</p> <p><b>Provider</b> ColdFusion</p> <p><b>Expiry</b> 2 Weeks</p>

### Sharing your information with others

We may use third party service providers to help operate our business and the Site or administer activities on our behalf, such as sending out newsletters or surveys. We may share your information with these third parties for those limited purposes provided that you have given us your permission.

The Sports Centre will not sell, distribute or lease your personal information to third parties unless you have given your permission or it is required by law to do so.

### Third party websites

Users may find other content on the Site that link to the sites and services of partners, suppliers, advertisers, sponsors, licensors and other third parties. The Sports Centre does not control the content or links that appear on these sites and are not responsible for the practices employed by websites linked to or from the Site. In addition, these sites or services, including their content and links, may be constantly changing. These sites and services may have their own privacy policies and customer service policies.

Browsing and interaction on any other website, including websites which have a link to our Site, is subject to that website's own terms and policies.

### **How long we keep personal data**

We will keep your personal data only for as long as is necessary for each purpose we use it. For the majority of membership data, this means we will retain it for as long as you have a valid Sports Centre membership and for a period of six years after your last interaction with the Sports Centre (for accounting, record keeping and tax reporting purposes).

### **Your rights**

Under certain circumstances, by law you have the right to:

- Request access to your personal data (“subject access request”). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have exercised your right to object to processing (see below).
- Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground.
- You can withdraw your consent, where this is the basis for our processing your data (without affecting the lawfulness of our previous processing based on consent).
- Request the transfer of your personal data to another party.

### **CCTV**

Closed circuit television is installed at the Sports Centre for security reasons. If you have any questions about the use of CCTV in the Sports Centre, please contact us directly. Notices about the use of CCTV are in evidence in and around the Sports Centre.

### **Surveys**

In order to improve the quality of the service we provide, we may ask you to complete a survey. You do not have to respond to this request.

### **Data accuracy and security**

The School will endeavour to ensure that all personal data held in relation to an individual is as up to date and accurate as possible. Individuals must notify the Sports Centre of any significant changes to important information, such as contact details, held about them.

The Sports Centre will take appropriate technical and organisational steps to ensure the security of personal data about individuals, including policies around use of technology and devices, and access to school systems. All staff and governors will be made aware of this policy and their duties under Data Protection Law and receive relevant training.

### **Your marketing preferences**

We will always respect your wishes in respect of what type of communications you want to receive from us and how you want to receive them. There are some communications, however, that we need to send you regardless of your marketing preferences in order for us to fulfil our contractual obligations to you as a member of the Sports Centre.

Examples of these essential communications are:

- Records of transactions, such as payment receipts or direct debit confirmations (as applicable).
- Membership related mailings such as your membership renewal reminder, information about facility closures and opening hours.

You are in control of how we communicate with you. You can update your choices and/or contact details by contacting us at:

Email: [SportsCentre@hawthorns.com](mailto:SportsCentre@hawthorns.com)

Phone: 01883 743377

Post: The Hawthorns School Sports Centre, Pendell Court, Bletchingley, Surrey RH1 4QJ

### **This notice**

The Sports Centre has the discretion to update this Privacy Notice at any time. Any substantial changes that affect your rights will be provided to you directly as far as is reasonably practicable.

### **Queries and complaints**

Any comments or queries on this notice should be directed to the Compliance and Privacy Officer.

If an individual believes that the Sports Centre has not complied with this policy or acted otherwise than in accordance with Data Protection Law, they should utilise the School complaints procedure and should also notify the Compliance and Privacy Officer. An individual may lodge a complaint with the Information Commissioner's Office (ICO), although the ICO recommends that steps are taken to resolve the matter with the School before involving the regulator.