# **Privacy Notice**

# Woodley Gojo Ryu Karate Club

This Privacy Notice outlines the basis on which we will process personally identifying information ('Personal data') that we collect, receive, and use from website and marketing activities, and customers who subscribe to our newsletters, attend our events, classes or training.

#### Our privacy commitments

- · We will only collect, keep, use, and share Personal Data for legitimate business purposes that we explain below, or if we're legally required to do so.
- · We will be as clear and open as we can with you on what Personal Data we collect and how it will be processed.
- · For as long as we maintain records of your Personal Data, we will keep it up to date and protect it with appropriate safety measures.

#### WHAT INFORMATION WE COLLECT ABOUT YOU

The personal data you have provided, we have collected from you, or we have received from third parties include:

- Personal Data collected directly from you through the enquiry process: your name, phone number, postal address, email address, gender, health, and fitness information and date of birth. Our legal basis for the collection and processing of this data is the provision to you of the services purchased by you.
- Personal Data collected automatically from the use by you of the social media marketing sites. The data transmitted from your browser includes your IP address, the date and time of the visit the pages accessed, the access status/HTTP status code, your browser, your operating system and interface, as well as the language and version of the browser software. The legal basis for collecting and processing this personal data is to be able to operate the sites and provide you with access to the pages you wish to access.
- Personal Data received indirectly through our suppliers or partners which enables us to create and store a record of your purchase history. The legal basis for collecting and processing this personal data is within our legitimate interests in knowing more about our clients.

#### HOW WE COLLECT INFORMATION ABOUT YOU

Most of the personal information we hold about you is that which we collect directly from you, for example:

- · each time you ask us for a quotation or make an enquiry
- · when you purchase our services
- · when you register to receive information from us
- · when you call to discuss any issue with us
- · each time you interact with us, respond to communications, surveys, competitions

# **Event and Training Clients and Parents/Guardians**

We collect the following data from you as an event or training client or parent or guardian:

- Data Collected Directly: your name, email address, postal address, gender, and age (if appropriate) in the enrolment and registration process.
- Data Collected Indirectly: your attendance history.

We also use certain marketing and social media tools to collect personal information, in accordance with our legitimate interest in providing content that is of interest to our website users, subscribers, and followers on social media:

# **SOCIAL MEDIA**

We receive the following Personal Data about you if you follow one of our social media accounts: Your account name, gender, general interests, location, age. Our legal basis for processing this data is our legitimate interest in providing social media and marketing content that is of interest to our followers on social media.

#### **USING YOUR PERSONAL DATA**

We use your Personal Data:

- · For the administration of your bookings for classes, training, and our events and to contact you about your purchase (for example with details on times and dates and to confirm your attendance).
- · To contact you with marketing messages which you have requested or agreed to receive from us (for example via a branded newsletter);
- · To contact you with surveys and feedback requests (for example relating to an event you attended)
- $\cdot$  To analyse the purchase history of our customers and the way our customers use the sites.

# USING YOUR PERSONAL DATA FOR MARKETING

We will send you marketing about similar products and services by post, telephone, email, SMS and through digital channels. Digital channels include social media and similar such digital marketing channels.

You can object to receiving marketing from us at any time. Please follow the unsubscribe link in our marketing emails; or send us your name, address, and date of birth via email to **sensei@woodleykarateclub.co.uk** or by post to: Data Protection Officer, Woodley Gojo Ryu Karate Club, 8 Harvard Close, Woodley, Reading, Berkshire, RG5 4UJ.

We consider that it is within our legitimate interests to send you information about our products and services for marketing purposes.

# **AUTOMATED DECISIONS AND PROFILING**

We commit to not using personal data you provide to us for automated profiling.

### WHO WE SHARE YOUR DATA WITH

Woodley Gojo Ryu Karate Club will not sell your information. We will not share your information with any third party except as stated in this Privacy Notice or as required to provide our services to you and administer your account.

We may share your information with the following categories of third parties:

- · third party service providers who we instruct for the purposes of handling software systems or data audits.
- · third parties involved in assistance in providing accounting support
- · third party service providers who support the operation of our business, such as IT and marketing suppliers, and debt collection agencies (as is necessary for the performance of a contract between you and us and/or as is necessary for our legitimate interests);
- · regulators and law enforcement agencies, including the police, the Financial Conduct Authority, HM Revenue and Customs or any other relevant authority who may have jurisdiction (as is necessary for compliance with our legal obligations).

# HOW LONG YOUR INFORMATION IS KEPT

We will retain your personal information for a number of purposes, as necessary to allow us to carry out our business. We will maintain records of your Personal Data for as long as you:

- · remain a registered client or user of any of our products or services.
- · remain a registered subscriber to our mailing list.
- · have completed a purchase in the last 36 months, or
- · as is necessary to provide our business services to you.

If you have not opened any email communication from Woodley Gojo Ryu Karate Club or interacted in any other way with us for 5 years we will regard you as an inactive subscriber and delete your details from our records except where retention is necessary to enable us to enforce our legal rights, or to protect the rights, property, or safety of our employees.

### **DATA SECURITY**

- We maintain technical and physical safeguards that are designed to protect the security and integrity of your Personal Data, and to guard it against accidental or unauthorised access, use, alteration, or disclosure to unauthorised third parties. These measures include device encryption and virus checking procedures.
- · Where Personal Data is kept as paper copy these are kept locked securely in a cabinet which is only accessible to authorised employees.
- Where we keep Personal Data files on local devices these devices are protected and accessible only to authorised employees.
- We regularly review our security systems to ensure that your Personal Data remains safe and secure.

### **DISPOSAL OF PERSONAL DATA**

• When required, we shall ensure that any personal data is disposed of in a secure manner such that the information is not recoverable.

#### **YOUR RIGHTS**

Under the Data Protection Act 1998 you have the following rights:

- to obtain access to, and copies of, the personal information that we hold about you.
- $\cdot$  to require that we cease processing your personal information if the processing is causing you damage or distress; and
- · to require us not to send you marketing communications.

Once the GDPR comes into force on 25 May 2018, you will also have the following rights:

- $\cdot$  to require us to erase your personal information.
- · to require us to restrict or object to our data processing activities.
- to receive from us the personal information we hold about you which you have provided to us, in a reasonable format specified by you, including for the purpose of you transmitting that personal information to another data controller; and
- to require us to correct the personal information we hold about you if it is incorrect.
- · Changes to our Privacy Notice
- · We will update this Privacy Notice from time to time to reflect changes in our business. All such changes will be posted to the website and if we consider it to be appropriate, we will notify subscribers of any material changes by e-mail.

Please note that these rights may be limited by data protection legislation, and we may be entitled to refuse requests where exceptions apply.

If you are not satisfied with how we are processing your personal information, you can make a complaint to the Information Commissioner.

You can find out more about your rights under data protection legislation from the Information Commissioner's Office website: www.ico.org.uk