

PRIVACY POLICY

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, or visit our facility. 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.

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.

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

When purchases are made via the MindBody Booking system your bank account number and sort code data are stored. They are stored in servers and back up servers located in the US and have the required Privacy Shield certification aligning with the regulations in place.

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.

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.

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.

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 free as part of a health or other scheme

- 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 and we will investigate your complaint and get back to you as soon as possible.

Contacting us

In most instances it is best to contact us locally where you take part in our services such as the Leisure Centre or the Health Service you normally attend. We can usually deal with most of your queries here.

You can also contact us through our contacts pages on our website www.rawinc.co.uk

Alternatively, you can write

Data Controller
RAW Inc Training
199-209 Hornchurch Road
Hornchurch
Essex
RM12 4TJ