

### Who is responsible for your data?

Our Privacy Notice applies to the personal data that The Athlete Centre collects and uses.

References in this Privacy Notice to “The Athlete Centre”, “we”, “us” or “our” means JNW Fitness Limited (Trading as “The Athlete Centre”) (a company registered in England and Wales with registration no 08378491 and registered office at Studio 1/2, Osney Mead House, Osney Mead Estate, Oxford, OX2 0EA). We control the ways your personal data are collected and the purposes for which your personal data are used and are therefore the “data controller” for the purposes of the GDPR 2018, UK Data Protection Act 1998 and any other applicable European data protection legislation.

### Categories of data we collect

We may collect and process the following categories of information about you:

Your title, name and surname, and your contact details (email address and/or telephone number) The company you work for/represent (if contact is on behalf of company, or relying on company for special benefit)	When you join our gym When you visit our gym When you make a booking When you request information about our services via email/call/website When you are named contact for a supplier
Information about your health, if you have a medical condition that may affect your treatment or use of the gym (please see “special categories of personal data” below for more information)	When you provide us with this information before a gym session or group exercise class
Your date of birth, company, postal address, photograph and bank details	When you join our gym or change your details
Information about your transactions, including your payment card details	When you purchase products or services
Your site visits	When you visit our site
The communications you exchange with us (for example, your emails, letters, calls, or logs of face to face interactions)	When you contact The Athlete Centre or you are contacted by The Athlete Centre
Your posts and messages on social media directed to The Athlete Centre	When you interact with us on social media
Your feedback	When you reply to our requests for feedback or participate in our customer surveys
Your preferred types of exercise/interests	When you choose to provide this information to a member of our team,

	while creating or managing your preferences on your online account
Information about how you use our website	When you navigate on our website
Information that relates to your Athlete Centre memberships (for example if you have a corporate discount or annual/monthly membership)	When you obtain, renew or cancel your Athlete Centre membership

### **Special categories of personal data**

In the course of providing services to you, we may collect information that is considered “special categories of personal data” eg completion of a health questionnaire prior to a clinical or massage treatment. We only collect this information where you have given your explicit consent, it is necessary to protect your vital interests, or you have deliberately made it public. If you do not allow us to process any special category personal data, this may mean we are unable to provide all or parts of the services you have requested from us.

### **How and why we use your personal data**

#### ***To fulfil contractual obligations and provide our services to you***

Gym membership is a contract between The Athlete Centre and each individual member, so we require your personal data and photo ID in order to activate your membership and enable you to use our online systems, and to allow us to verify your identity when necessary.

In the case of clinical or massage bookings, we will store information regarding the treatments you have in order to provide continuity in your treatments and ensure we are adhering to health and safety and insurance requirements.

#### ***To communicate with you and manage our relationship with you***

We may need to contact you by social media, email, phone, letter and/or SMS for administrative, customer service or operational reasons, please be aware that these communications are not made for marketing purposes and as such, you will continue to receive them even if you choose not to receive marketing communications. Examples of these include; changes to pricing structure or unplanned gym closures.

We will also use your personal data to contact you after you have visited the gym as a guest, made a booking for; a class, used our clinical or massage services, sent us a request, filled in a web-form through our website or contacted us on social media.

Your opinion is very important to us, so we may send you an email or SMS to seek your feedback.

We will use the communications you exchange with us and the feedback you may provide in order to manage our relationship with you as our customer and to improve our services and experiences for other members and guests.

Having a named company contact for our suppliers and/or corporate accounts means we can communicate more efficiently with you for payment purposes or with any account queries. As a named company contact at a company in the vicinity of one of our sites means we can liaise with you directly to negotiate benefits and offers exclusive to your employees and keep track of any negotiations.

If you attempt to join online or make a booking, then you leave our website before this has been finalised, we may contact you in order to help you easily complete your transaction.

***To personalise and improve your customer experience***

We may also collect information on how you use our website, which pages of our website you visit most, which classes you attend/book and what services you use/purchase, in order to understand what you like. We may use this information to tailor the content and offers that you see on our website and to send you relevant messages that we think you might like.

To raise awareness and enable you to share your achievements with others, we post photos and/or videos on social media, of any special events or challenges that we organise. Please be aware that if you take part, you may be included in these.

***To inform you about our news and offers that you may like***

As part of our service, we will email you with gym news and offers that we have negotiated for our members and guests. If you do not wish to receive this additional information, please email “**Unsubscribe**” to **membership@theathletecentre.com**

As a previous member, we may contact you up to 24 months after your membership end date, if we have a re-joining offer exclusive to previous members.

If you have not made a purchase from us, we will only contact you via SMS/email/phone with updates, such as; offers and events IF you have consented to this (with the exception of direct response to a query). You can ‘unconsent’ to contact at any time by emailing “**Unsubscribe**” to **membership@theathletecentre.com**

***To improve our services, for administration purposes and to protect our business interests***

The business purposes for which we will use your information include accounting, budgeting, billing and audit, credit or other payment card verification, safety, security, statistical and marketing analysis, systems testing, maintenance, ordering of supplies, planning and development. To comply with any other legal obligations.

**Sharing your personal data**

Your personal data may be disclosed to a third party who acquires us, or substantially all of our assets.

We may also share some of your personal data with, or obtain your personal data from, the following categories of third parties:

- Wodify, or any other software provider with whom we contract to provide membership management services. Wodify’s privacy policy can be accessed here <https://www.wodify.com/privacy-policy>
- Postal or digital mailing company/app – to send out communication to you on our behalf.
- Specialist survey company/app – to send out surveys to you on our behalf (you are not obliged to respond to them).
- Internal independent service providers e.g. Personal Trainer, Massage Therapist or Clinical Practitioner – so, *on your request*, they can provide their services to you.
- Bank/credit or debit card companies – in order to process your payments for services.

- Credit control company – with prior notification, should contracted membership subscriptions or payment for goods or services become overdue (as per our T&C's).
- Web servers/website providers – hosting/storing some personal data.
- IT support company – able to access some information to assist with IT issues.
- Social media site – hashed email matched to account to create custom audience file

In addition to the categories of recipient listed above, we may disclose your personal data when this is required by the law of any jurisdiction to which The Athlete Centre may be subject.

#### **Data transferred outside the EU**

Some of the companies we use for our apps are situated in third countries; therefore some data may be transferred to countries outside the European Economic Area (EEA). Transfers of data to these companies are either on the basis of adequacy, or subject to appropriate safeguards.

#### **Security of your personal data**

We are committed to taking appropriate technical and organisational measures to protect your personal data against unauthorised or unlawful processing and against accidental loss, destruction or damage to personal data.

As described in this Privacy Notice, we may in some instances disclose your personal data to third parties. Where The Athlete Centre discloses your personal data to a third party, we require them to have appropriate technical and organisational measures in place to protect your personal data; however in some instances we may be compelled by law to disclose your personal data to a third party, over which we have limited control.

#### **Cookies**

We use cookies when you visit our site. By using our site, you agree to us placing these sorts of cookies on your device and accessing them when you visit the site in the future. If you do not agree to our use of cookies in this way, you should set your browser settings accordingly or not use the The Athlete Centre site. If you disable the cookies that we use, this may impact your user experience while on the The Athlete Centre site.

There are three main types of cookies – here's how and why we use them.

- Site functionality cookies – these cookies allow you to navigate the site and use our features.
- Site analytics/performance cookies – these cookies allow us to measure and analyse how our visitors use the site, to improve both its functionality and your experience. These cookies don't identify you as an individual.
- Targeting or advertising cookies – these cookies are used to deliver ads relevant to you. They also limit the number of times that you see an ad and help us measure the effectiveness of our marketing campaigns.

If you want to delete any cookies that are already on your computer, the "help" section in your browser should provide instructions on how to locate the file or directory that stores cookies.

Further information about cookies can be found at <https://ico.org.uk/for-organisations/guide-to-pecr/cookies-and-similar-technologies/>.

Please note that by deleting or disabling future cookies, your user experience may be affected and you might not be able to take advantage of certain functions of our site, and the complete The Athlete Centre web experience

We may occasionally include links to third party websites on our emails and/or website. We do not take any responsibility for these sites, the cookies they use or how they manage any data you may provide to them.

### **Retention Period**

We will retain your personal data for the period necessary to fulfill the purposes outlined in this Privacy Notice unless a longer retention period is required or permitted by law, for example to comply with retention obligations e.g. under tax or contract law. You can *request* deletion of your personal data at any time (see the section below on your right to **erasure**).

### **Your rights**

Your rights are as follows (noting that these rights don't apply in all circumstances):

- The *right to request access* to your personal data and information about how we process it
- The *right to rectification* – we will correct your personal data if it's inaccurate and complete any incomplete personal data. It is your responsibility to ensure that you submit true, accurate and complete information to us. You have the ability to change certain information via your online account (such as email and address).
- The *right to erasure* – you have the right to *request* that we delete personal data that we hold about you.
- The *right to restrict processing*
- The *right to object to processing* – if you would like us to stop processing your personal data, you can email “**Unsubscribe**” to **membership@theathletecentre.com**
- The *right to Data Portability* – move, copy or transfer your personal data

### **Updates to our Privacy Notice**

We may update this Privacy Notice to reflect changes to our information practices or in line with new legislation. We encourage you to periodically review the Privacy Notice on our website for the latest information on our privacy practices.

### **Contacting The Athlete Centre**

If you have any questions or concerns about this Privacy Notice, or the way The Athlete Centre are processing your data, or would like to exercise your rights in relation to your personal data, please contact our Data Protection Officer (DPO) Michelle Morbey at [membership@theathletecentre.com](mailto:membership@theathletecentre.com).

If you have a complaint or concern about how we are processing your personal information then we will endeavor to address such concern(s). However, if you would like to direct your complaint/concerns to a Data Protection Authority, the contact details for your local Data Protection Authority are as follows: <https://ico.org.uk/global/contact-us/>.

*Last updated: 23rd May 2018*