

# Woodrush High School

An Academy for Students Aged 11-18

## Privacy Policy

### Sports Centre and Community Hub



<b>Policy author / reviewer</b>	R Allen
<b>Responsible LGB committee</b>	Resources Committee
<b>Date ratified</b>	To be confirmed
<b>Status</b>	Statutory
<b>Date of next review</b>	every 3 years



## Privacy Policy

Woodrush Sport and Leisure, part of Woodrush High School Academy ("WSL") is committed to protecting and respecting your privacy. For the purposes of the General Data Protection Regulations (GDPR) and any subsequent UK legislation covering data protection, the Data Controller is Woodrush High School Academy.

This Policy sets out why we collect personal information about individuals and how we use that information. It explains the legal basis for this and the rights you have over the way your information is used.

This Policy covers WSL in relation to the collection and use of the information you give us. We may change this Policy from time to time. If we make any significant changes we will advertise this on the website or contact you directly with the information. Please check this page occasionally to make sure you are happy with any changes.

If you have any questions about this Policy or concerning your personal information, please contact our DPO [dpo@woodrushhigh.worcs.sch.uk](mailto:dpo@woodrushhigh.worcs.sch.uk) or by post to Shawhurst Lane, Hollywood, Birmingham, B475JW.

What type of personal information we collect

The type and amount of information we collect depends on why you are providing it.

The information we collect when you make an enquiry includes:-

- First name
- Last name
- Job title
- Gender
- Preferred pronoun
- Date of birth
- Email (for login)
- Address (including billing address)
- Postcode
- Geo-location data (your geographical location based on your IP address)

If you are a job applicant, the information you are asked to provide is as set out in the application and necessary for the purposes of our considering the application.

### Customers and Members Specific:

For those joining our organisation or hiring / booking our facilities we will also include collect the following information:

Club Name  
Booking Name  
Address  
Email Address  
Contact Numbers  
First Aider Name, Contact Number, Email Address (if applicable)  
Public Liability Insurance documentation (if applicable)  
CRB/DBS no. (if applicable, we don't keep a copy of this anymore)  
Coaching Certification (if applicable)

Rush Active Gym Members have an option to utilise our Prescribe Software to further support their fitness progression. This software is developed and managed by our third party provider Technogym. The following information is collected:

Name  
Date of Birth  
Gender



Address

Email Address

Contact Number

Emergency Contact Information (same as above)

Bank Details (we don't keep these on file, but they get passed on to the Harlands Group (for more information see below)

For those who chose to make their membership payments via Direct Debit the following information will be collected and managed by our third party provider Harland Groups:

This information is processed via Harland's Group on our behalf and is protected through a data processing agreement we have with them.

Party Booking information includes:

Name

Childs Name

Age of Birthday Child

Medical Information

Address

Email Address

Contact Number

Names of other children attending (only applicable with party food orders)

## Health and Medical Information

If you are a standard Rush Active Gym Member we do not generally collect sensitive health or medical information from you unless it is volunteered by you.

If you are on a GP referral scheme, your information will be provided to us by your GP or through Bromsgrove District Council, and this may include some sensitive personal information relating to your health. Our receipt of this sensitive personal information, and use of it to produce a tailored fitness programme which will be of more benefit to you, is lawful because you have given your express consent to us (or to the relevant third party we received this information from when you first signed up to the GP referral scheme) to use your sensitive personal information for these purposes. We will also share results of your fitness and health progression with these third party providers where it is lawful to do so, because we have your express consent to use your personal data in this way, given to us by you independently of this Privacy Policy.

We will also collect certain medical personal data as part of children's party bookings for the sole purpose of ensuring the safety of participants. This health/medical information data is collected on our behalf by the person who has made the booking, who will distribute our standard medical consent form to parents/guardians of other participants, or participants themselves (where the participant can validly give consent), and collect the completed consent forms in sealed envelopes, before returning them to us prior to the party.

You may withdraw your consent at any time (see the "How to remove your consent or opt-out" section below). Please note that if you do not give consent to us holding and using your sensitive personal information for this purpose, we may only be able to provide a limited version of our services to you, or in some circumstances, we may not be able to provide our service at all (in the interests of your wellbeing and safety).

## How we collect information

We may collect information from you whenever you contact us or have any involvement with us for example when you:

- visit our website
- enquire about our activities or services
- sign up to receive news about our activities or services
- create or update a profile
- post content onto our website/social media sites
- attend a meeting with us and provide us with information



- take part in our events
- contact us in any way including online, email, phone, SMS, social media or post

## **Where we collect information from**

### **We collect information:**

(1) from you when you give it to us directly: you may provide your details when you ask us for information, attend our events or contact us for any other reason. Your information may be collected by an organisation we are working with, but we are still responsible for your information.

(2) when you give it to us indirectly: your information may be shared with us by other organisations. They should only do so in the way they have set out in their own Privacy Policy which you should check when you give your details.

(3) when you have given other organisations permission to share it: your information may be provided to us by other organisations if you have given them your permission. This might for example be a business working with us or when you buy a product or service from a third party organisation. The information we receive from other organisations depends on your settings or the option responses you have given them.

(4) when you use our website: information about you is recorded and stored when you use our website. See the information about the use of cookies under that heading below.

(5) When it is available on social media: depending on your settings or the privacy policies applying for social media and messaging services you use, like Facebook, Instagram or Twitter, you might give us permission to access information from those accounts or services.

## **How we use your information**

We will use your personal information in a number of ways which reflect the legal basis applying to processing of your data. These may include:

- providing you with the information or services you have asked for
- sending you communications with your consent that may be of interest, including marketing information about our services and activities
- when necessary, for carrying out your obligations under any contract between us
- seeking your views on the services or activities we carry on, so that we can make improvements
- maintaining our organisational records and ensuring we know how you prefer to be contacted
- analysing the operation of our website and analysing your website behaviour to improve the website and its usefulness
- processing job applications
- We reserve the right to take photographs of our facilities (which may include you, provided your inclusion is incidental) for press and promotional purposes.

## **Use of Aggregated Data**

Where Data can be aggregated (and anonymised), we may use this for research purposes without restriction.

For example, we may monitor customer traffic patterns, Site and Services usage and related information in order to optimise users' usage of the Site and Services and we may give aggregated statistics to a reputable third-party.

We are entitled to do this because the resulting data will not personally identify you and will therefore no longer constitute personal data for the purposes of data protection laws.

## **Our legal basis for processing your information**



The use of your information for the purposes set out above is lawful because one or more of the following applies:

- where you have provided information to us for the purposes of requesting information or requesting that we carry out a service for you, we will proceed on the basis that you have given consent to us using the information for that purpose, based on the way that you provided the information to us. You may withdraw consent at any time by emailing us at [info@woodrushsportscentre.co.uk](mailto:info@woodrushsportscentre.co.uk). This will not affect the lawfulness of processing of your information prior to your withdrawal of consent being received and actioned;
- it is necessary for us to hold and use your information so that we can carry out our obligations under a contract entered into with you or to take steps you ask us to prior to entering into a contract;
- it is necessary to comply with our legal obligations.
- where the purpose of our processing is the provision of information or services to you, we may also rely on the fact that it is necessary for our legitimate interests in relation to providing the information or service requested, and given that you have made the request, would presume that there is no prejudice to you in our fulfilling your request;
- it is necessary to rely on the provision of our third party data processors in handling our customers/members information in order to provide the level of service offered.

If you want to contact us about your marketing preferences please contact [info@woodrushsportscentre.co.uk](mailto:info@woodrushsportscentre.co.uk) or call on 01564820099.

## **How to remove your consent or opt-out**

You may withdraw your consent or opt-out of our lawful use of your personal data for the purposes outlined above at any time, either by using the opt-out option (where available), by emailing us at [info@woodrushsportscentre.co.uk](mailto:info@woodrushsportscentre.co.uk) or by calling us on 01564820099.

## **How we keep your information safe**

We understand the importance of keeping your personal information secure and take appropriate steps to safeguard it.

We have carried out a full audit and risk assessment of all of processes relating to personal data management. All personal information is stored in secure and restricted areas. In addition, all digital data is managed under our IT Policy and ensures it remains secure and restricted.

We always ensure only authorised persons have access to your information, which means only our employees and contractors, and that everyone who has access is appropriately trained to manage your information.

No data transmission over the internet can be guaranteed to be completely secure. So whilst we strive to safeguard your information, we cannot guarantee the security of any information you provide online and you do this at your own risk.

## **Who has access to your information?**

- Third parties who provide services for us, for example for Direct Debit management, collecting or processing data for fitness management or collecting or processing data for sending mailings. We select our third party service providers with care. We provide these third parties with the information that is necessary to provide the service and we will have an agreement in place that requires them to operate with the same care over data protection as we do
- Third parties if we run an event in conjunction with them. We will let you know how your data is used when you register for any event
- Analytics and search engine providers that help us to improve our website and its use
- Third parties in connection with restructuring or reorganisation of our operations, for example if we merge with another business. In such event, we will take steps to ensure your privacy rights will



be protected by the third party

We may also disclose your personal information if we are required to do so under any legal obligation and may use external data for the purposes of fraud prevention and credit risk reduction, or where doing so would not infringe your rights, but is necessary and in the public interest.

Other than this, we will not share your information with other organisations without your consent.

## Keeping your information up to date

Please would you let us know if your contact details change. You can do so by contacting us at [info@woodrushsportscentre.co.uk](mailto:info@woodrushsportscentre.co.uk).

## Cookies

In addition to the information which you supply to us, information and data may be automatically collected through the use of cookies. Cookies are small text files employed on the Site to recognise repeat users and allow us to observe behaviour and compile aggregate data in order to improve the Site for you. For example, cookies will tell us whether you viewed the Site with sound or with text on your last visit. Cookies also allow us to count the number of unique and return visitors to our Site. Some of our associated companies may themselves use cookies on their own websites. We have no access to, or control of these cookies, should this occur.

Cookies may be either “persistent” cookies or “session” cookies. A persistent cookie consists of a text file sent by a web server to a web browser, which will be stored by the browser and will remain valid until its set expiry date (unless deleted by the user before the expiry date). A session cookie, on the other hand, will expire at the end of the user session, when the web browser is closed.

The law states that we can store cookies on your machine if they are essential to the operation of the Site, but that for all others we need your permission to do so.

The list below explains the cookies we use and why :

Cookie Description	Name	Purpose
session cookie	view_user_id	Visit log
session cookie	activity	Page log

## Opting out of cookies

If you do not wish to receive cookies from us or any other website, you should be able to turn cookies off on your web browser: please follow your browser provider’s instruction in order to do so. Unfortunately, we cannot accept liability for any malfunctioning of your PC or its installed web browser as a result of any attempt to turn off cookies.

To find out more about cookies, including how to see what cookies have been set and how to manage and delete them, visit [www.aboutcookies.org](http://www.aboutcookies.org) or [www.allaboutcookies.org](http://www.allaboutcookies.org).

[Note: Cookie notice pop ups are also required. We have enclosed a specimen with our GDPR template pack]

How long we keep your information for

We will hold your personal information for as long as it is necessary for the relevant activity. Please see our Records Retention Policy at [www.woodrushsportscentre.co.uk](http://www.woodrushsportscentre.co.uk)

Where we rely on your consent to contact you for direct marketing purposes, we will treat your consent as lasting for as long as it is reasonable to do so. This will usually be for [three] years. We may periodically ask you to renew your consent.



If you ask us to stop contacting you with marketing materials, we will keep a record of your contact details and limited information needed to ensure we comply with your request.

## Your rights

You have the right to request details of the processing activities that we carry out with your personal information through making a subject access request. Such requests have to be made in writing. Please note that from 25 May 2018, no charge may be made under the GDPR except in very limited circumstances (which will be explained to you upon request). More details about how to make a request, and the procedure to be followed, can be found in our Data Protection Policy. To make a request, please contact us at [info@woodrushsportscentre.co.uk](mailto:info@woodrushsportscentre.co.uk).

You also have the following rights:

- the right to request rectification of information that is inaccurate or out of date;
- the right to erasure of your information (known as the “right to be forgotten”);
- the right to restrict the way in which we are dealing with and using your information; and
- the right to request that your information be provided to you in a format that is secure and suitable for re-use (known as the “right to portability”);
- rights in relation to automated decision making and profiling including profiling for marketing purposes.

All of these rights are subject to certain safeguards and limits or exemptions, further details of which can be found in our Data Protection Policy. To exercise any of these rights, you should contact our DPO at [dpo@woodrushhigh.worcs.sch.uk](mailto:dpo@woodrushhigh.worcs.sch.uk) or call 01564823777, or write to the DPO to Woodrush High School, Shawhurst Lane, Hollywood, Birmingham, B475JW

If you are not happy with the way in which we have processed or dealt with your information, you can complain to the Information Commissioner’s Office. Further details about how to complain can be found [here](#).

## Surveys and user groups

We always aim to improve the services we offer. As a result, we occasionally canvass our customers using surveys (where the customer has opted in for this). Participation in surveys is voluntary, and you are under no obligation to reply to any survey you might receive from us. Should you choose to do so, we will treat the information you provide with the same high standard of care as all other customer information.

## Competitions

Your participation on our Site may mean that we occasionally contact you with the opportunity to enter competitions (where you have opted in to receive information about competitions). Entry to competitions is voluntary, and you are under no obligation to take up an invitation from us to enter. Should you choose to enter a competition, we will treat the information you provide with the same high standard of care as all other customer information, and use the information provided strictly within the entry terms of the competition and this Privacy Policy.

## Changes to this Privacy Policy

This Policy may be changed from time to time. If we make any significant changes we will advertise this on our website or contact you directly with the information. We recommend that you read this Privacy Policy each time you consider giving your personal information to us.

This Policy was last updated in May 2018