

## Privacy Notice

This privacy notice is published in accordance with the EU General Data Protection Regulations (GDPR) which formally comes into effect on the 25th May 2018. This notice provides general information on the way in which the personal information you provide is managed and processed by Wolverton Leisure Trust (the 'data controller').

### The Data Controller and Contact Details

Wolverton Leisure Trust is the Data Controller for the personal data you provide. The contact details for you to exercise any of your data protection rights or to raise any concerns you may have regarding your personal data are:

Head Office, Wolverton Leisure Trust, Wolverton Swimming and Fitness Centre, Addington Avenue, Wolverton, Milton Keynes, MK12 5GH

Email: [management@wolvertonpool.com](mailto:management@wolvertonpool.com)

Tel: 01908 227752

### Information we collect about you

We may collect and process the following data about you:

- Information provided voluntarily by you. For example, when you register for information, apply for a particular service or make a comment or complaint
- Information that you provide when you communicate with us by any means such as email, letter or telephone call
- Information collected using cookies on your computer about how you browse our website

### Use of Your Personal Data

The information you have provided to Wolverton Leisure Trust will be used to administer your membership or as part of a service set up. This could include Wolverton Leisure Trust contacting you following application/submission or attendance at the centre.

Contractual use of your personal information, which will have been provided when you made your membership application or service booking/registration, will form part of your contract with Wolverton Leisure Trust as part of your membership/access to service e.g. swimming lesson booking.

The consequences of not completing the membership/registration and agreeing to this use of your personal information is that Wolverton Leisure Trust will be unable to process your membership/requested service.

Wolverton Leisure Trust is legally able to process your personal data:

- when you have freely and explicitly provided your consent to this processing or
- when there is a statutory duty to collect and process this information to provide the required service or undertake a statutory function
- When your personal data forms part of a contract between you and Wolverton Leisure Trust

The consequence of you not providing personal information to Wolverton Leisure Trust is that we will be unable to process your enquiry or application.

**Personal data shall:**

- Be obtained and processed fairly and lawfully, it will not be processed unless one of the legal conditions as set out in the legislation is met
- Be obtained for a specified, limited, appropriate and lawful purpose, it will not be processed if incompatible for that intended purpose
- Used in a way that is adequate, relevant and not excessive
- Be accurate and kept up to date
- Kept for no longer than is absolutely necessary
- Handled according to people's data protection rights
- Kept safe and secure away from unauthorised access, accidental loss or destruction
- Not transferred outside the European Economic Area, unless that country has equivalent levels of protection for personal data

Employees who have access to or process personal information must ensure that they follow the above principles at all times.

**Wolverton Leisure Trust will adhere to legislation by:**

- Observing the conditions regarding the fair collection and use of information
- Specify the purposes of which the information is used to meet legal obligations
- Only collect and process appropriate information to the extent that it is needed to fulfil our operational needs and/or to comply with legal requirements
- Ensuring the quality of information we use
- Ensuring we do not hold the information any longer than necessary
- Ensuring the rights of people of whom the information is held under the Act (e.g. informing them that processing is being undertaken, to access personal information, correct, rectify or erase incorrect information)
- Ensuring we have the appropriate technical and organisational security measures to protect personal information
- Not transferring personal information abroad without suitable safeguards being in place



## Sharing of Personal Data

**Memberships:** The information you have provided will be shared with XN, TRP, Harlands and Mywellness for the purpose of managing memberships.

To maximise your membership experience you can also opt in to sharing your personal data and exercise records with Technogym UK and future system providers.

**All other services:** including swim scheme registration and booking, general bookings and enquiries - any information requested is required for the service and is not passed to a third party.

All marketing communications have clear unsubscribe options. For more information regarding any of the partners Wolverton Leisure Trust works with please contact head office on the details given.

Wolverton Leisure Trust may share the information you have provided to other agencies or organisations such as the Police, HM Revenues and Customs and the Department for Work and Pensions (DWP) where a request has been made and it is lawful to share the information.

All information provided will be sensitively saved and destroyed according to statutory requirements.

## Protecting Your Personal Data

Wolverton Leisure Trust and its administrative services partners will keep your unpublished personal data secure and within the European Economic Union (EEU). Where Wolverton Leisure Trust uses a third party to store your personal data and it is stored outside of the UK/EEU, Wolverton Leisure Trust will ensure that appropriate safeguards are in place to keep your personal data secure.

## Keeping Your Personal Data

Wolverton Leisure Trust will keep your personal data unless you explicitly request it to be removed. This right to have your data removed is not an absolute right, for example, we will need to retain your data if this information forms part of a statutory or legal obligation, public registry or an existing contract.

## What are cookies?

Our website puts small files (known as 'cookies') onto your computer to collect information about how you browse the Wolverton Leisure Trust site. Cookies are used to:

- measure how you use the website so it can be updated and improved based on your needs
- recognise the browser you use
- track new and returning users

You can disable cookies but this may have an impact on your experience when using the website.

### **Your responsibilities**

- Only provide personal information pertinent to its intended use
- Inform us as soon as possible if any of the personal information you have provided has changed, e.g. your address or other contact details.

### **Your Rights**

There are a number of rights that you may exercise depending on the legal basis for processing your personal data. In most cases, these rights are not absolute and there may be compelling or overriding legal reasons why Wolverton Leisure Trust cannot meet these rights in full. This will be explained to you in more detail should you contact the centre for any of the reasons detailed below:

- request a copy of the personal information Wolverton Leisure Trust holds about you;
- to have any inaccuracies corrected;
- to have your personal data erased;
- to place a restriction on the Wolverton Leisure Trust's processing of your data;
- to object to processing; and
- to request your data to be ported (data portability).

Where the processing of your personal data is based on your consent, in most circumstances you have the right to withdraw that consent at any time and Wolverton Leisure Trust will act on your instructions.

### **Monitoring and Review**

This policy and its procedures will be reviewed regularly for improvements as part of our quality assurance requirements. We reserve the right to change this policy at any time. This will ensure it is fit for purpose, reflects the services we deliver and that we provide services which are relevant to the requirements of individual needs.



If you have any concerns about how we process your personal data or wish to discuss how to exercise your rights, you should contact Wolverton Leisure Trust Head Office using the contact details provided.

Alternatively, you may wish to complain directly to the Information Commissioners Office. You can do this by writing to them at: Information Commissioners' Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF / Telephone: 0303 123 1113.



Managed by

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Registered Office: Wolverton Swimming and Fitness Centre, Addington  
Avenue, Wolverton, MK12 5GH Phone: 01908 227752  
Company No. 4135924 Charity No. 1089400

In partnership with

