

# **PRIVACY POLICY**

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## **1. INTRODUCTION**

- 1.1 Your privacy is extremely important to Falcon Gymnastics Club and we are fully committed to providing you with clear and transparent information about how we use your personal information. We value the trust you give us when sharing your personal information. We will ensure robust measures are in place to keep your information secure and will only use it for the purposes outlined in this notice.
- 1.2 This Policy outlines how we process personal information when you use the Falcon Gymnastics Club website or send communications to us. Falcon Gymnastics Club is the sole controller of the information provided for these purposes and will only use your information in accordance with this policy.
- 1.3 You do not need to give us any information about yourself to view the Falcon Gymnastics Club website. When you access the website, our webserver logs your Internet Protocol (IP) address (a unique set of numbers that identifies one or more devices on a computer network), browser identifier and the time of access.
- 1.4 By using our website and agreeing to this policy, you consent to our use of cookies in accordance with the terms of this policy [see section 11].

## **2. COLLECTING PERSONAL INFORMATION**

- 1.2 We may collect, store, and use the following kinds of personal information:
  - 2.1.1 information about your computer and about your visits to and use of this website (including your IP address, geographical location, browser type and version, operating system, referral source, length of visit, page views and website navigation paths).
  - 2.1.2 information that you provide to us when registering with our website (including your email address).
  - 2.1.3 information that you provide when completing your profile on our website (including your name, profile pictures, gender, date of birth, relationship status, interests and hobbies, educational details, and employment details).
  - 2.1.4 information that you provide to us for the purpose of subscribing to our email notifications and/or newsletters (including your name and email address).
  - 2.1.5 information that you provide to us when using the services on our website, or that is generated in the course of the use of those services (including the timing, frequency, and pattern of service use).
  - 2.1.6 information relating to any purchases you make of goods and/or services or any other transactions that you enter into through our website (including your name, address, telephone number, email address).
  - 2.1.7 information that you post to our website for publication on the internet (including your username, your profile pictures, and the content of your posts).
  - 2.1.8 information contained in or relating to any communication that you send to us or send through our website (including the communication content and metadata associated with the communication);
  - 2.1.1 any other personal information that you choose to send to us.

2.2 Before you disclose to us the personal information of another person, you must obtain that person's consent to both the disclosure and the processing of that personal information in accordance with this policy.

### **3. USING PERSONAL INFORMATION**

3.1 Personal information submitted to us through our website will be used for the purposes specified in this policy or on the relevant pages of the website.

3.2 We may use your personal information to:

- 3.2.1 administer our website and business.
- 3.2.2 personalise our website for you.
- 3.2.3 enable your use of the services available on our website.
- 3.2.4 send you goods purchased through our website.
- 3.2.5 supply to you services purchased through our website.
- 3.2.6 send statements, invoices and payment reminders to you, and collect payments from you.
- 3.2.7 send you non-marketing commercial communication.
- 3.2.8 send you email notifications that you have specifically requested.
- 3.2.9 send you our email newsletter, if you have requested it (you can inform us at any time if you no longer require the newsletter or unsubscribe).
- 3.2.10 send you marketing communications relating to Falcon Gymnastics Club which we think may be of interest to you, by post or, where you have specifically agreed to this, by email or similar technology (you can inform us at any time if you no longer require marketing communications or unsubscribe);
- 3.2.11 provide third parties with statistical information about our users (but those third parties will not be able to identify any individual user from that information);
- 3.2.12 deal with enquiries and complaints made by or about you relating to our website.
- 3.2.13 keep our website secure and prevent fraud; and
- 3.2.14 verify compliance with the terms and conditions governing the use of our website (including monitoring private messages sent through our website private messaging service).

3.3 If you submit personal information for publication on our website, we will publish and otherwise use that information in accordance with the license you grant to us.

3.4 Your privacy settings can be used to limit the publication of your information on our website and can be adjusted using privacy controls on the website.

3.5 We will not, without your express consent, supply your personal information to any third party for the purpose of their or any other third party's direct marketing.

3.6 Some of our financial transactions are handled through our payment services provider, Stripe. We will share information with our payment services provider only to the extent necessary for the purposes of processing payments you make via our website, refunding such payments and dealing with complaints and queries relating to such payments and refunds.

#### **4. DISCLOSING PERSONAL INFORMATION**

- 4.1 We may disclose your personal information to any of our employees, officers, insurers, professional advisers, agents, suppliers, or subcontractors insofar as reasonably necessary for the purposes set out in this policy.
- 4.2 We may disclose your personal information to any member of our group of companies (this means our subsidiaries, our ultimate holding company and all its subsidiaries) insofar as reasonably necessary for the purposes set out in this policy.
- 4.3 We may disclose your personal information:
  - 4.3.1 to the extent that we are required to do so by law.
  - 4.3.2 in connection with any ongoing or prospective legal proceedings.
  - 4.3.3 in order to establish, exercise or defend our legal rights (including providing information to others for the purposes of fraud prevention and reducing credit risk).
  - 4.3.4 to the purchaser (or prospective purchaser) of any business or asset that we are (or are contemplating) selling; and
  - 4.3.5 to any person who we reasonably believe may apply to a court or other competent authority for disclosure of that personal information where, in our reasonable opinion, such court or authority would be reasonably likely to order disclosure of that personal information.
- 4.4 Except as provided in this policy, we will not provide your personal information to third parties.

#### **5. RETAINING PERSONAL INFORMATION**

- 5.1 This Section 5 sets out our data retention policies and procedure, which are designed to help ensure that we comply with our legal obligations in relation to the retention and deletion of personal information.
- 5.2 Personal information that we process for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes. WE would expect to retain all data for a minimum of 7 years.
- 5.3 Notwithstanding the other provisions of this Section 5, we will retain documents (including electronic documents) containing personal data:
  - 5.3.1 to the extent that we are required to do so by law.
  - 5.3.3 if we believe that the documents may be relevant to any ongoing or prospective legal proceedings; and in order to establish, exercise or defend our legal rights (including providing information to others for the purposes of fraud prevention and reducing credit risk).

## **6. SECURITY OF PERSONAL INFORMATION**

- 6.1 We will take reasonable technical and organisational precautions to prevent the loss, misuse, or alteration of your personal information.
- 6.2 We will store all the personal information you provide on our secure (password- and firewall protected) servers.
- 6.3 All electronic financial transactions entered into through our website will be protected by encryption technology.
- 6.4 You acknowledge that the transmission of information over the internet is inherently insecure, and we cannot guarantee the security of data sent over the internet.
- 6.5 You are responsible for keeping the password you use for accessing our website confidential; we will not ask you for your password (except when you log in to our website).

## **7. AMENDMENTS**

- 7.1 We may update this policy from time to time by publishing a new version on our website.
- 7.2 You should check this page occasionally to ensure you are happy with any changes to this policy.
- 7.3 We may notify you of changes to this policy [by email or through the private messaging system on our website].

## **8. YOUR RIGHTS**

- 8.1 You may instruct us to provide you with any personal information we hold about you; provision of such information will be subject to:
  - 8.1.1 the payment of a fee (currently fixed at GBP 10.00); and
  - 8.1.2 the supply of appropriate evidence of your identity [(for this purpose, we will usually accept a photocopy of your passport certified by a solicitor or bank plus an original copy of a utility bill showing your current address).
- 8.2 We may withhold personal information that you request to the extent permitted by law.
- 8.3 You may instruct us at any time not to process your personal information for marketing purposes.

8.4 In practice, you will usually either expressly agree in advance to our use of your personal information for marketing purposes, or we will provide you with an opportunity to opt out of the use of your personal information for marketing purposes.

## **9. THIRD PARTY WEBSITES**

9.1 Our website includes hyperlinks to, and details of, third party websites.

9.2 We have no control over, and are not responsible for, the privacy policies and practices of third parties.

## **10. UPDATING INFORMATION**

10.1 Please let us know if the personal information that we hold about you needs to be corrected or updated either by calling the Club on 07917 657956 and ask for Sue, via email [sue@falcongym.com](mailto:sue@falcongym.com) or logging into your Account on our website [www.falcongym.com](http://www.falcongym.com)

## **11. COOKIES**

11.1 Our website uses cookies.

11.2 Cookies are small text files that are stored on your PC, phone or other web-enabled device when you visit the site. They are not harmful and do not contain any personal or confidential information such as your home address, date of birth or credit card details.

11.3 Cookies are an essential part of how our website works – they are needed to help provide you with a quick, responsive and personalised web experience. Cookies allow the website to remember actions that you have performed on the site, your preferences and the pages you have visited. They also tell the site that you have returned. Some aspects of the website cannot function effectively without using cookies.

11.4 Cookies may be either "persistent" cookies or "session" cookies: a persistent cookie will be stored by a web 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. We use both session and persistent cookies on our website.

11.5 Strictly necessary cookies are essential in order to enable you to move around our website and use all the different features, such as accessing secure areas of the website.

11.6 Performance cookies help us understand how people are using our website. This information allows us to get to know how you use the website, which in turn can help us to improve the

way the website works, making it more user-friendly, which should help enable you to find what you are looking for.

- 11.7 Cookies do not typically contain any information that personally identifies a user, but personal information that we store about you may be linked to the information stored in and obtained from cookies.
- 11.8 Most browsers allow you to refuse to accept cookies. Blocking all cookies will have a negative impact upon the usability of many websites. If you block cookies, you will not be able to use all the features on our website. You can delete cookies already stored on your computer. Deleting cookies will have a negative impact on the usability of many websites.

## **12. DATA PROTECTION REGISTRATION**

- 12.1 We are registered as a data controller with the UK Information Commissioner's Office.
- 12.2 Our data protection registration number is ZB126968.

## **13. OUR DETAILS**

- 13.1 This website is owned and operated by Falcon Gymnastics Club.
- 13.2 Falcon Gymnastics Club Limited is a company limited by guarantee and registered in England and Wales under Registration Number 5195514 and our registered office is John Wildman Accountant, 15 Grove Place, Bedford MK40 3JJ.
- 13.3 Our principal place of business is at Falcon Gym, 5 Regent Close Bedford, MK41 7XG
- 13.4 You can contact us:
  - 13.4.1 by post, using the postal address given above.
  - 13.4.2 using our website contact form.
  - 13.4.3 by telephone, on the contact number published on our website from time to time; or
  - 13.4.5 by email, using the email address published on our website.

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