

Customer Privacy Policy

enjoyleisure takes your privacy seriously.

The enclosed document outlines:

- What personal information we need
- Why we request it
- How it will be used
- How we store it
- How long it will be kept for

Should you have any questions relating to this policy please contact **enjoy**leisure via email: <u>info@enjoyleisure.com</u> or call: 0131 653 5200.



enjoyleisure.com 0131 653 5200 | info@enjoyleisure.com





enjoyleisure, also known as Enjoy East Lothian Ltd, is a charitable Leisure Trust who manage and deliver sports and leisure services on behalf of East Lothian Council.

enjoyleisure will be the "data controller" of the personal information that you provide to us; whether this is provided verbally, electronically or in written format; in our facilities, via our website or in person.

All data collected will be held securely and retained by **enjoy**leisure. We will store your information with our contracted partners and software providers in order to assist us in delivering our services to you.

Your data will not be sold to any other organisations. We will not share your information with any third parties unless we are legally obliged to do so.

When you register with **enjoy**leisure or take out a membership with us (including if you are registering or renewing on behalf of a child under the age of 16), we may ask you for the following information:

- Contact details name, address, postcode email address, telephone, mobile
- Personal information, gender, date of birth, any pre-existing medical conditions.
- Financial information, e.g. bank account number, sort code, card details
- We may require sight of further proof of identity to process membership applications
- For online interactions, we may collect your IP address, web browser type and version, cookie information.

Photography

We may request to take your photograph which will be held on our electronic customer database, which is linked to our point of sale system. This enables us to identify you as a customer at the point of entrance, and prevent fraudulent use of your account.

Why we need your personal information - consent

Where you are happy for us to do so, we will use your Personal Information

to contact you in a timely fashion – using electronic methods of communication namely email and/or text message.

In addition you can choose to receive communication from **enjoy**leisure to:

- Advise you of the activities and services available via enjoyleisure, e.g. upcoming events, courses and activities that we feel be of interest to you – including (but not limited to) summer activities programme, membership packages, coached activity programmes, online booking opportunities.
- If we partner with another organisations, who have something to offer you e.g. opportunity to participate / attend an event (e.g. triathlon), offer you a discount or promotional offer e.g. on sporting / retail equipment, or connection with a local club or charity event. In these circumstances, all communication will be sent from enjoyleisure. Your personal contact information will not be passed to any other organisations.

You have the right to change your communication preferences at any time or request that we stop sending your communications by contacting us at info@enjoyleisure.com or logging onto your account via enjoylesiure.com. Additionally there is also an 'unsubscribe' button at the bottom of every email communication we send.

Why we need your personal information - contractual purposes

We need to collect your information so that we can manage your customer account and provide the services you have requested from us.

We will use your personal information to:

- Book an activity, course, competition, event, training course with us.
 Information may be collected in writing on application forms, in person, verbally over the phone or via online form.
- Process a membership application.
- Send you communications via email, text or post in relation to essential customer services, including but not limited to facility opening / closure notices, confirmation / amendments

to bookings, information relating to membership services e.g. payment information or renewal notices.

If you do not provide us with all of the personal information that we need to collect then this may affect our ability to offer the above booking / membership services and benefits.

Why we need your personal information – legitimate purposes

We also process your personal information in pursuit of our legitimate business interests to:

- Monitor and develop the delivery of our services and customer engagement by inviting customers to participate in surveys for researching and development purposes.
- Your information may be used for data profiling, however any results would be anonymised and grouped.
- Develop and maintain progress reports through coached activity programmes or training courses.
 We will communicate with the participant and/or their named contact to provide updates on progress reports, upcoming assessment dates, renewal requirements and to verify if any pre-requisite training has been completed.
- Respond to and communicate with customers regarding questions, comments, concerns, complaints or support needs in relation to activities and services provided by enjoyleisure.

Where we process your personal information in pursuit of our legitimate interests, you have the right to object to us using your personal information for the above purposes.

If you wish to object to any of the above processing, please contact us on 0131 653 5200 or email info@enjoyleisure.com.

If we agree and comply with your objection, this may affect our ability to undertake the tasks above for the benefit of you as a customer / member.

Why we need your personal information - legal obligations

We are under a legal obligation to process certain personal information relating to our customers, for the purposes of complying with legal obligations.

- Club, Event or Extended Let
 Bookings may be subject to
 additional verification checks such as
 proof of membership / association
 with registered governing body,
 public liability insurance, event
 permits, risk assessments, evidence
 of appropriate PVG checks and club
 constitution documentation.
- In order to provide anonymized statistical data to governing bodies pertaining to the use of sports and leisure facilities activities by gender, age, disability, geographical location (postcode profiling).



We may ask you if we can process your personal information for additional purposes. Where we do so, we will provide you with an additional privacy notice with information on how we will use your information for these additional purposes.

Who we share your personal information with

We may be required to share personal information with statutory or regulatory authorities and organisations to comply with statutory obligations. Such organisations include the Health & Safety Executive, Disclosure Scotland, and Police Scotland for the purposes of safeguarding children and vulnerable groups.

We may also share personal information with our professional and legal advisors for the purposes of taking advice.

enjoyleisure either contracts or has partnership agreements with third party suppliers to provide services, or assist us in the delivery of services to our customers. This includes, but is not

limited to:

- East Lothian Council, Forth Electrical Services Facilities Management, (FES) who have management responsibility for the Mercat Gait Centre in Prestonpans.
- IT and online application software solutions. These suppliers may process personal information on our behalf as "processors" and are subject to written contractual conditions to only process that personal information under our instructions and protect it.

In the event that we do share personal information with external third parties, we will only share such personal information strictly required for the specific purposes and take reasonable steps to ensure that recipients shall only process the disclosed personal information in accordance with those purposes.

If your personal information (including your image) is included in any photographs or videos taken by **enjoy**leisure within our facilities, we may share this for promotional and/or journalistic purposes in printed materials, on websites and on social media.

Training Courses

As a training provider we may be required to share your personal data as a condition of your registration / membership / affiliation on a training course with the awarding body.

In such circumstances, we will detail what information will be shared with the awarding body, who will become a controller of your personal information when they receive it.

How we protect your personal information

Your personal information is stored on our electronic filing system and our servers based in the UK and EU and is accessed by our staff / volunteers for the purposes set out above.

We may be required to transfer your personal information out with the EU in order to utilise IT software packages that are provided by international suppliers. For example to report accidents / incidents and collecting customer feedback.



We will only keep your personal information for as long as necessary to provide you with our requested services.

We will review our customer data regularly. Unless you ask us not to, at the point in which we identify there has been inactivity on your account for 2+ years, we will delete your personal information.

We will keep certain personal information of direct debit paying members for longer in order to confirm your identity, when you were a member of and for how long. We have a data retention policy that sets out the periods for retaining and reviewing all information that we hold. This sets out different retention periods and you can request a copy by contacting us at info@enjoyleisure.com

Your rights

You can exercise any of the following rights by writing to us at **enjoy**leisure Head Office, Musselburgh Sports Centre, Newbigging, Musselburgh, EH21 7AS or info@enjoyleisure.com or by logging on to your account at www.enjoyleisure.com.

Your rights in relation to your personal information are:

- You have a right to request access to the personal information that we hold about you by making a "subject access request";
- If you believe that any of your personal information is inaccurate or incomplete, you have a right to request that we correct or complete your personal information;
- You have a right to request that we restrict the processing of your personal information for specific purposes;
- If you wish us to delete your personal information, you may request that we do so.

Any requests received by **enjoy**leisure will be considered under applicable data protection legislation. If you remain dissatisfied, you have a right to raise a complaint with the Information Commissioner's Office at www.ico.org.uk.

Customer Privacy Policy

The enclosed Privacy Policy applies to customers utilising the services and facilities at each of the **enjoy**leisure managed venues in East Lothian:

SPORTS CENTRES

- Aubigny Sports Centre, Mill Wynd, Haddington, EH41 4DB T: 01620 820650
- Dunbar Leisure Pool, Castle Park, Dunbar, EH42 1EU T: 01620 820655
- Loch Centre, Well Wynd, Tranent, EH33 2JX T: 01875 824140
- Meadowmill Sports Centre, By Tranent, EH33 1LZ T: 01875 619079
- Musselburgh Sports Centre, Newbigging, Musselburgh, EH217AS T: 0131 653 5208
- North Berwick Sports Centre, Grange Road, North Berwick, EH39 4QS T: 01620 820730

Where applicable your data will be shared with Forth Electrical Services, Facilities Management (FES) in order to provide customer access to the Mercat Gait Centre, Preston Road, Prestonpans, EH32 9EN

GOLF COURSES

Musselburgh Links, The Old Golf Course, Balcarres Road, Musselburgh, EH21 7SR T: 0131 653 5122

Winterfield Golf Course, Back Road, Dunbar, EH42 1XE

CLIMBING WALL

Climbing Wall, Foresters Park Pavilion, Lindores Drive, Tranent, EH33 1HY T: 01875 824140

SEASONAL FACILITIES

North Berwick East & West Links

Fisherrow Links, Musselburgh

PITCHES & PAVILIONS

Numerous across East Lothian.

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