

## PRIVACY POLICY

This Privacy Policy relates to customer data processed by Studio Flare.

This Privacy Policy informs customers and users about the collection, use and sharing of personal information we collect on our websites, on our App, at our centres, venues and through the various services we offer. This Privacy Policy is designed to protect our users by informing you how personal information is collected, how we look after that information and with whom we share it.

Studio Flare is committed to complying with the Data Protection Act 2018, the General Data Protection Regulation (GDPR) and The Privacy and Electronic Communications (EC Directive) Regulations 2003. By using our websites, and Fitness Studio, you are consenting to us processing your information in the ways stated here.

## What information do we collect and why?

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

#### Details of your transactions

We collect data for any transactions you carry out through our websites and services, so that we can administer the services you have with us. Please note that we never store your payment details on our booking system or website.

#### Sensitive Health Data

We collect any personal health data you provide to us when registering and signing up for our health services. We collect this information to ensure we are offering you the right services and so your progress can be tracked by yourself and us. We may ask you for information about your health to recommend appropriate exercise regimes or offer our other services.

#### Banking data

We process bank card information at the time we take payment. This data is not stored on our systems and is processed on Payment Card Industry Data Security Standard compliant banking systems. Information about website visits including IP address. The IP address is your computer's individual identification number. We use your IP address to capture information about website visits so we can learn more about how our customers use the website in order to find ways to improve the website and our products and services for your benefit. Please see our Cookie Policy for more information.

#### Customer feedback

We will record customer comments and surveys about how we are performing.

# Your communications preferences.

We keep a record of any permissions and preferences you give us about what types of communication you are happy to receive from us.

## Data relating to children

Children aged under 16 years must have a parent or guardian's consent before providing personal information to us. We do not wish to collect any personal information without this consent.

#### Where we collect your data from

We use different methods to collect data from and about you including through:

Any personal details you give us or we obtain from third parties.

Information you type into our websites or provide to one of our colleagues such as when you become a member, create your profile, update your member profile, provide activity data from other devices, make a booking, sign up as a volunteer or visit one of our centres.

This information may include your personal contact data, fitness-related data which has been obtained to create personalised fitness workouts for you or health related data. We use this to provide you with the services you request, tell you about services you are eligible for, to keep in contact with you, manage your account and the services we provide. If you contact us by email, via the website, social network, in person or by telephone we may keep a record of your contact information and enquiry and may subsequently use your contact details to respond to your enquiry.

## Purposes for which we will use your data

We have set out below a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

The grounds on which we collect and process your data are consent. Occasionally there may be a lawful reason for collecting data, for example when there is an accident where we may need to provide details of this to the relevant health and safety authorities. We may also process your data based on our legitimate business interests, for example in order to operate and improve our business.

#### How do we store and protect your personal information?

These are the basic guidelines we use to look after your personal data

- We maintain secure systems to protect your personal information
- We respect your wishes about how we contact you, whether by post, telephone, email or text message
- We will update your information or preferences promptly when you ask us to
- We will respond fully to requests from you to see the information that we hold on you.
- We will not hold your personal information for longer than is necessary for our legitimate business purposes.
- We follow strict procedures when storing or handling information that you have given us. Some information is encrypted, such as payment transactions and password.
- We will never sell your personal information to a third party.

## **Retention Policy**

We retain personal information as long as we consider it useful to contact you, or as needed to comply with our legal obligations. Where data is not needed for legal or statutory purposes, we will delete this information if you request. See the contacts section to request your data to be deleted. You are able to opt out of us sending you messages at any time by contacting us.

# Services provided by contracted third parties

Studio Flare may share information with third party organisations that provide specific services on our behalf which enhance our products and your experience with us. These organisations act as a Data Processor under our instructions. They may process data securely outside of the EEA. There is a contract in place with each third party which includes strict terms and conditions to protect your privacy. You are able to opt out of third parties sending you messages at any time by contacting us.