

## PRIVACY POLICY

### INTRODUCTION

At Oakley Fitness LTD we are committed to protecting your privacy.

We collect and process personal data about you to provide the services you use, to operate our business, meet our contractual and legal obligations, protect the security of our systems and our customers, or fulfil other legitimate interests.

Our Privacy Notice explains how we collect, use, share and protect your personal information. If you have any further questions concerning this policy please contact us by phone on 01689 821 484 or by email at [info@oakleyfitness.co.uk](mailto:info@oakleyfitness.co.uk).

### IDENTITY OF DATA CONTROLLER

The Data Controller in respect of this Privacy Notice is Oakley Fitness Ltd.

### WHAT PERSONAL DATA DO WE COLLECT?

When you purchase memberships or products from us, we may ask you for personal data including your name, address, date of birth, contact telephone number, email address and photo of you.

Your payment information is not held by us; it is collected and stored securely by our third party payment processors, Harlands group, DFC and cardsave. They participate in the EU/US Privacy Shield agreement which commits them to providing adequate safeguards over your personal data. DFC and Harlands are based in the UK. Our contract with these suppliers contains appropriate clauses to protect your information.

We may ask for a fingerprint scan, as a condition of membership. This provides additional security for us and you that the person entering the gym is the registered member.

- We do not store your fingerprint. We create a unique encrypted binary code from your fingerprint. The system charts the distance between certain ridges of a fingerprint and converts the information into an encrypted binary code.
- There is no way to generate an image of your fingerprint from the scan taken.
- The encrypted code is stored securely on our server.
- This code is only recognised by our systems. It cannot be accessed or used by any third party outside of our access systems.

We also collect data in our gyms through our CCTV system. Please see our CCTV privacy notice for more information.

### WHY DO WE COLLECT THIS INFORMATION?

The information we collect is required for the purpose of creating your Member Account and for you to enrol in our gyms. You will receive confirmation of this from the DD Company via email. We require this information in order to process your payment and to provide you with the services you use.

We may use your telephone number or email address to contact you regarding your purchase or your contract with us. This includes, but is not limited to, class booking confirmations or cancelations, your account information, and to return lost items.

## WHAT INFORMATION DO WE COLLECT?

The information we collect allows you to be identified as a member of Oakley Fitness and includes:

- Name, date of birth, e-mail address, postal address, telephone number, Photo and Fingerprint
- Credit or debit card information, information about your bank account number and sort code or other banking information. Note that we do not store your bank or credit card details these are held by the DD Company.
- Your usage records and any changes to your membership details.
- Your contact with us, such as a note, email or other records of any contact you have with us
- Your membership information – such as dates of payment owed and received, the services you use and any other information related to your account

We do not use the information you provide to make any automated decisions that might affect you.

## HOW DO WE USE THIS INFORMATION?

We will use your personal information to provide you with the services, products or information that you have requested, for administration purposes, and return lost items.

We only share your information with our DD companies as stated above and with our IT or software providers, who provided us with security, and up-to-date information for our systems to keep your data safe.

## HOW LONG DO WE KEEP YOUR MEMBERSHIP INFORMATION FOR?

We store your information for as long as you are a Member of Oakley Fitness, and after cancellation to verify that you have been a previous member at Oakley Fitness to apply relevant discounts, when re-joining.

When we process your personal data based on your consent you have the right to withdraw consent at any time. Alternatively, if you are no longer a member, and wish to remove your consent please contact us by email at [info@oakleyfitness.co.uk](mailto:info@oakleyfitness.co.uk)

## COLLECTION OF CHILDREN'S DATA

If you are under 16 and complete an Online Membership Agreement, your information will be processed and used as listed above, though your parent will need to be present when signing up and using the gym.

## MARKETING

At Oakley Fitness we can reassure you that we will not contact you at any point for marketing, we only advertise, on-site, in public magazines, spaces and the like, as company policy we will not use your data for marketing of any kind.

## **CCTV**

This privacy notice tells you about the information we collect about you via CCTV when you use our gyms. In collecting this information, we are acting as a data controller and, by law, we are required to provide you with information about us, about why and how we use your data, and about the rights you have over your data.

## **WHAT PERSONAL DATA DO WE COLLECT?**

Our gyms are monitored by CCTV 24 hours a day. Oakley Fitness LTD reserves the right for its employees and contractors to review footage as required and by entering any of our gyms you consent to your image being recorded and reviewed and waive any and all claims in relation to the same.

All cameras are located in prominent positions within public and staff view and do not infringe on sensitive areas. All CCTV surveillance is automatically recorded and any breach of this siting policy will be detected via controlled access to the CCTV System and auditing of the CCTV System.

The images produced by the equipment will as far as possible be of a quality that is effective for the purpose(s) for which they are intended. Upon installation, all equipment is tested to ensure that only the designated areas are monitored and suitable quality pictures are available in live and play back mode.

Prior to any camera installation we will ensure that the installation complies with this policy and that the use of any camera is justified, necessary and proportionate. We will regularly assess whether the use of any camera and the CCTV System as a whole continues to be justified, necessary and proportionate.

## **WHY DO WE COLLECT THIS INFORMATION?**

The purpose of the use of the CCTV Systems and the collection and processing of CCTV images is for:

1. the prevention or detection of crime or disorder,
2. apprehension and prosecution of offenders (including use of images as evidence in criminal proceedings),
3. interest of public and employee Health and Safety,
4. protection of public health
5. The protection of our property and assets.

## **WHAT DO WE DO WITH YOUR INFORMATION?**

Recorded CCTV footage will be stored securely and retained in compliance with the GDPR. All images are digitally recorded and stored securely within the system's hard drives. Viewing of images within the system is controlled by the Data Protection Officer or a person nominated to act on their behalf. Only persons trained in the use of the equipment can access data. How long do we keep your information for? Images are stored for a minimum of 14 days, and stored for no more than 30 days.

Where the images are required for evidential purposes or disciplinary proceedings, a copy file will be moved to an access controlled confidential location on the network and held until completion of the investigation.

### WHO HAS ACCESS TO MY INFORMATION?

Access to, and disclosure of, the images recorded by our CCTV System and similar surveillance equipment is restricted and carefully controlled. This ensures that the rights of individuals are preserved and the continuity of evidence remains intact should the images be required for evidential purposes e.g. a police enquiry or an investigation being undertaken as part of an internal procedure. Access to the medium on which the images are displayed and recorded is restricted to the Data Protection Officer, staff authorised by them and third parties as authorised from time to time for specific purposes. Access to and disclosure of images is permitted only if it supports the purpose for which such images were collected.

### YOUR RIGHTS OVER YOUR CCTV DATA

You have the right to request access to CCTV images which contain your personal data. This access request must be submitted formally in writing, with sufficient details to identify the section of footage with which you are concerned and to enable 24/7 Fitness to satisfy itself that the person making the request is the data subject of that specific recording. Upon receipt of the request, the Data Protection Officer, or another member of staff authorised by them, will determine whether disclosure is appropriate and whether there is a duty of care to protect the images of any third parties. If the duty of care cannot be discharged then the request can be refused. A written response will be made to the individual, giving the decision (and if the request has been refused, giving reasons) within 31 days of receipt of the request.

### YOUR PRIVACY RIGHTS

- By law, you can ask us what information we hold about you, and you can ask us to correct it if it is inaccurate.
- If we have asked for your consent to process your personal data, you may withdraw that consent at any time.
- If we are processing your personal data for reasons of consent or to fulfil a contract, you can ask us to give you a copy of the information in a machine-readable format so that you can transfer it to another provider.
- If we are processing your personal data for reasons of consent or legitimate interest, you can request that your data be erased.
- You have the right to ask us to stop using your information for a period of time if you believe we are not doing so lawfully.
- You have the right to ask for a copy of the information we hold about you and to have any inaccuracies in your information corrected. Please contact us through email at [info@oakleyfitness.co.uk](mailto:info@oakleyfitness.co.uk).
- Finally, in some circumstances you can ask us not to reach decisions affecting you using automated processing or profiling.

To submit a request regarding your personal data by email or telephone, please use the contact information provided above.