



SLT PRIVACY POLICY

Here at the Sandwell Leisure Trust we take the protection of your personal information very seriously. We take all precautions necessary to ensure that the information you entrust to us will be held securely and processed in accordance with the Data Protection Act 1998, and our own internal code of ethics.

This policy sets out the information you need to know to understand how we will process and protect your information.

Below we shall refer to the 'Data Subject', and to clarify this is individual whose personal information we hold; they could be a member of the club, member of staff, volunteer or other identifiable individual.

Who we are?

For the purposes of the Data Protection Act 1998 (The Act), the Data Controller is the charity Sandwell Leisure Trust (SLT), of Carnegie Building, Victoria Road, Tipton, DY4 8SR. Our nominated representative for the purposes of the Act is Mark Wildman.

Our full contact details can be found at the end of this policy.

Why we need your information

We need your personal information to allow us to offer our services to you and to comply with our legal and fiduciary duties.

Personal information may be collected and processed for the following purposes: -

- **Membership**
To allow for the administration of sport and leisure membership; by understanding member's interests and preferences we can provide members with targeted communications (direct mail) and concessions and other additional benefits. Personal and financial information is essential to manage ongoing subscriptions and payments.
- **Human Resources, Payroll & Finance**
To comply with employment legislation and ensure that all staff and volunteers working within the organisation are qualified, competent, vetted and receive ongoing training.
- **Business Support & Executive Functions**
SLT will use the information you give us to arrange for venue hire and function/event management. We may use personal information in communications with public authorities and organisations, but only where absolutely necessary. For example, if we are seeking legal advice, or in the event of a compliant, child safeguarding issue, or where we are otherwise legally obliged to share the information.
- Wherever possible we shall obtain the consent of the data subject before sharing.



What Information we capture

SLT collect information through membership and application forms and through our websites www.slt-leisure.co.uk and www.rylandcentre.co.uk.

We will only collect the minimum amount of information necessary to allow us to provide our service to you, or discharge our legal responsibilities. The information we collect will include:-

For Members

We will collect personal information including name and contact details, such as address, email and phone number; also with your explicit permission certain pieces of sensitive information. We ask about medical conditions in order that we can tailor services to your needs, and in the event of an emergency may pass this to the emergency services.

We collect details of ethnicity for diversity and monitoring purposes.

Other financial information such as bank and direct debit requests together with subscription history will be maintained.

Children

We do not actively market to children, and we never knowingly ask a child to reveal personal information. Personal information on minors is required to allow us to offer specific facilities such as our holiday camp activities, coached sessions, memberships and swimming lessons, but information will always be obtained from, and permission requested from a parent or guardian. Applications, registrations and or agreements such as direct debits must be completed and authorised by a parent or guardian for any children aged 17 years and under.

Employees & volunteers

We will collect all personal information required to comply with employment legislation, including where necessary sensitive information. This may include medical information and where additionally appropriate we will perform a criminal record search. To prevent discrimination, and ensure diversity we shall request information from the Data Subject on religion, sexuality and ethnicity.

CCTV

In order to prevent and detect crime, and to ensure the safety of our members and staff, we operate CCTV systems at our various locations. These cameras record footage in real-time and are operated and controlled by our own staff; monitoring and recording does not take place in any changing room and toilet areas.

Cookies

Anonymous user data is recorded when visiting our website, please see the section on cookies and Google Analytics below. No data is purchased or shared with any third parties. You can view the SLT Cookie Policy from our website on this here; <https://www.slt-leisure.co.uk/cookie-policy>



How we process your Information

We will only use your personal information for the purpose for which it was given, we will not keep it for longer than is necessary and will destroy the information securely according to our formal retention policy.

Unless a valid reason exists to retain longer, membership records are usually deleted 12 months after their subscription has expired or a member left, all other records retained for 7 years after the last official action. Job application files for unsuccessful applicants are destroyed after 12 months of the decision being made.

In order to process bookings, membership payments and financial transactions we use trusted and authorised secure third party websites. Personal or sensitive information is not held or shared by third parties including any outside of the UK.

Where we store your information

Your personal information will be hosted securely within the UK. If we transfer your information to a data processor, for example, an email broadcast company to assist us in keeping you up-to-date with announcements, news and information, and they are located outside of the EEA, we shall take all reasonable steps to ensure that your information is protected as if we hosted it ourselves. No information is transferred or backed up outside of the UK.

Who we share your information with

Your information will only be shared within the Sandwell Leisure Trust, which is comprised of the Sandwell Leisure Trust Charity, our trading arm Sandwell Leisure Trust Limited and our 10 leisure centres.

We will never share or sell your personal information with any other third parties save where we are required to do so by court order or law. For example, we may be required to pass names of members or images from CCTV to the police to investigate a crime.

If we are the subject of a merger or takeover then your personal information will be passed to the new entity, but will only be used for the same or similar purpose you gave it for. You will be informed of the change and given the opportunity to withdraw consent.

Marketing, Consents & Permissions

We wish to keep you updated of our activities, events and special offers, but will only do so with your express permission. When you join as a member, or show an interest in our facilities, you will be invited to opt-in to receiving information by your preferred marketing channel, this includes email, Post, text message (SMS) and telephone.

You have a right to change, amend or withdraw your consent to receive direct marketing messages at any time. You can do this by contacting memberships@slt-leisure.co.uk or by selecting and or following unsubscribe options from e-shots and or text campaigns.



Cookie Policy

Cookies are small text files that are placed on your computer by websites that you visit. They are widely used in order to make websites work, or work more efficiently, as well as to provide information to the owners of the site. You can view the SLT Cookie Policy from our website on this here; <https://www.slt-leisure.co.uk/cookie-policy>

We do not store any personal data in the cookies that we use, and store your visitor information anonymously to assist us in the running of the site, and also for monitoring the activity and traffic both to and through our website. To do this we use Google Analytics cookies.

Depending on the browser you use you should be able to control what cookies are placed on your device through the browser settings. To find out more about cookies, including how to see what cookies have been set and how to manage and delete them, visit www.aboutcookies.org or www.allaboutcookies.org.

Google analytics

We use Google Analytics to analyse the use of our websites; Google Analytics generates statistical and other information about website use by means of cookies, which are stored on users' devices.

The information generated relating to our website is used to create reports about the use of our website. Details captured during your visit will include, but not limited to, traffic data, location data, weblogs and other communication data and the resources you access, however, all data collected is anonymous and will not identify you as an individual.

Google, not SLT, store this activity information, and you can view Google's privacy policy at <http://www.google.com/privacypolicy.html>.

To opt out of being tracked by Google Analytics across all websites visit <https://tools.google.com/dlpage/gaoptout>

Your rights

The Data Protection Act 1998 and GDPR May 2018 provides an individual rights which are listed below for your convenience:-

- You have the right to be informed about how we ensure the 'fair processing of your information' and transparency of what we do as stated in this Privacy Policy.
- You have the right to access a copy of the personal information we hold about you by making a Subject Access Request (SAR) in writing or by email to Sandwell Leisure Trust for attention of the Data Protection Officer. Full contact details are provided at the end of this Privacy Policy.
- You have the right of rectification to amend or update your personal information and ensure we maintain accurate and up to date records and or data about you.
- You have the right to erasure, also known as 'the right to be forgotten'. The broad principle underpinning this right is to enable an individual to request the deletion or removal of personal data where there is no compelling reason for its continued processing by Sandwell Leisure Trust.



- You have the right to 'block' or suppress the processing of your personal data. Processing of your personal information may be restricted in the event it is no longer essential to support the use of services provided to you and or not part of any contractual, legal or financial requirement to do so. Sandwell Leisure Trust is permitted to store the personal data, but not further process it. Sandwell Leisure Trust may retain just enough information about you to ensure that any restriction is respected in future.
- You have the right for data portability which allows individuals to obtain and or reuse their personal data for their own purposes across different services. It allows you to move, copy or transfer personal data easily from one IT environment to another in a safe and secure way, without hindrance to usability.
- You have the right to object to the processing of your personal information based on legitimate interests or the performance of a task in the public interest or exercise of official authority including profiling activity, direct marketing including profiling activity; and processing for purposes of scientific and or historical research and statistics.
- You have right to be made aware of any automated decision-making, that made without any human involvement, and or profiling of your personal information by Sandwell Leisure Trust.

For all Data Protection matters including Subject Access Requests please contact the trusts Data Protection Officer mark.wildman@slt-leisure.co.uk

Our contact details

SANDWELL LEISURE TRUST

Carnegie Building,

Victoria Road,

Tipton

DY4 8SR

Tel: 0300 012 0121

Email: info@slt-leisure.co.uk

Data Protection Officer: Mark Wildman

Charity Reg No. 1102431

Limited Company Reg No. 5011501

ICO Registration No. Z8714496

Complaints

If you are unhappy with how we have processed your personal information please firstly contact the Data Protection Officer listed above, if you are still unhappy you may contact the following:

Information Commissioner's Office

Wycliffe House

Water Lane

Wilmslow

Cheshire, SK9 5AF

Helpline: 0303 123 1113 (local rate) or +44 1625 545 745