

Privacy Notice

1. How we use your information

1.1. This privacy notice tells you what to expect when Alive Leisure collects personal information. It provides information on how we collect, use, store and manage personal information and who we may share it with. This privacy notice applies to information we collect about:

- 1.1.1. people who use our services, e.g. customers managing their accounts and personal data; buying products and services.
- 1.1.2. people who apply for a grant under Alive Leisure Grants and Funding Programmes;
- 1.1.3. data protection management and requests;
- 1.1.4. visitors to our websites;
- 1.1.5. how we use cookies;
- 1.1.6. job applicants; and our
- 1.1.7. current and former employees.

1.2. Your privacy is important to us and we will manage any information you provide to us within the requirements of the Data Protection Act 1998, the General Data Protection Regulations (GDPR) 2018 and the Data Protection Bill 2018 (together the **Data Protection Legislation**).

2. Personal information

Whilst using our website, software applications or services, you may be required to provide personal information (name, address, email, account details, etc.). We will use this information to administer our website, applications, client databases, marketing material and deliver our services. We will ensure that all personal information supplied is held securely in accordance with the GDPR Bill. Further, by providing telephone and email details, you consent to Alive Leisure contacting you using that method for the purposes of managing your account. You have the right at any time to request a copy of the personal information we hold on you. Should you wish to receive a copy of this, or would like to be removed from our database, please contact us via the DPO elaine.hinds@aliveleisure.co.uk

3. Information collection and use

3.1. How do we collect information?

Alive Leisure collects information in two possible ways:

3.1.1. *When you directly give it to us ("Directly Provided Data")*

When you sign up for our site, purchase our products or communicate with us, you may choose to voluntarily give us certain information – for example, by filling in text boxes or completing registration forms. All this information requires a direct action by you at that time in order for us to receive it.

3.1.2. *When you give us permission to obtain from other accounts ("User Authorised Data")*

Depending on your settings or the privacy policies for other online services, you may give us permission to obtain information from your account with those other services. For example, this can be via social media or by choosing to send us your location data when accessing our website from your smartphone.

3.2. How do we use information?

3.2.1. Personal Information you supply to us may be used in a number of ways, for example:

3.2.1.1. To manage your account and membership with Alive Leisure.

3.2.1.2. For audit and debt collection.

3.2.1.3. For fraud prevention.

3.2.1.4. To inform you of facility closures.

3.2.1.5. To inform you of cancelled classes and bookings.

3.2.1.6. To inform you of urgent facility information.

3.2.1.7. For statistical analysis relevant to our business needs.

3.2.2. Sensitive Personal Information you supply to us may be used in a number of ways, for example:

3.2.2.1. Medical information supplied will be shared with Instructors to plan sessions and ensure you are fit to participate in activities or make reasonable adjustments for your inclusion. Some of these staff may be third party sub-contracted providers or volunteers.

3.2.2.2. Physiological and medical information may be analysed to monitor your progress. For example, we may monitor your weight, body fat or blood pressure over time so you can see the progress you are making against your personal activity goals.

3.2.2.3. Statistical analysis relevant to our business needs.

3.2.3. We may share your Personal Information with third party data processors who look after aspects of our business such as:

3.2.3.1. Alive Management Ltd, the local authority company who operationally operate facilities on our behalf.

3.2.3.2. The Borough Council of King's Lynn and West Norfolk who manage our IT systems.

3.2.3.3. Sub-contracted staff/organisations who deliver activities on our behalf. These organisations will only receive the information necessary for the purpose of the activity/service they are providing.

3.2.3.4. Precision Mailing for direct mail.

3.2.3.5. Software providers such as:

- a. Legend Leisure Ltd, who host our leisure management system which includes our leisure customer data base.
- b. CAP2 Solutions who provide our Courses Pro system for our sports lessons where participants progress can be monitored.
- c. Patron Base, which is our main theatre operating system and database.
- d. Mail Chimp, Purple Seven, Graphic Design House and Mandrill, for email communication with our customers.
- e. Message Bird, for text message communications with our customers.
- f. Capita, for payment processing including direct debit, chip and pin and online payments.
- g. Wix for our Kaset website.
- h. The LTA and Sports Labs for Tennis for Kids sessions through Clubspark.

3.2.4. We will not share your Personal Information with any organisations that do not provide a service to Alive Leisure's business operations unless required to do so by law.

3.2.5. Alive Leisure will not sell or rent your personally identifiable information, gathered as a result of filling out registration forms or membership agreements, to anyone.

3.3. Choosing how we use your data

3.3.1. We understand that you trust us with your personal information and we are committed to ensuring you can manage the privacy and security of your personal information yourself.

3.3.2. With respect to the information relating to you that ends up in our possession, and recognising that it is your choice to provide us with your personally identifiable information, we commit to giving you the ability to do all of the following:

3.3.2.1. You can verify the details you have submitted to Alive Leisure by contacting our Alive Card Service team by emailing alive.card@aliveleisure.co.uk. Our security procedures mean that we may request proof of identity before we reveal information, including your e-mail address, DoB, Alive Card number and possibly your address.

3.3.2.2. You can also contact us by the same method to change, correct, or delete your personal information controlled by Alive Leisure regarding your profile at any time. Please note though that, if you have shared any information with others through social media channels, that information may remain visible, even if your account is deleted.

3.3.2.3. If your account is deactivated, we may retain archived copies of your information as required by law or for legitimate business purposes (including to help address fraud and spam).

3.3.2.4. If your personal information changes please update us with your new details by emailing Alive Card Services at alive.card@aliveleisure.co.uk or through your online account portal at www.aliveleisure.co.uk.

3.3.2.5. You can unsubscribe from receiving marketing emails from us by clicking the "unsubscribe" link at the bottom of any email. Once you do this, you will no

longer receive any marketing related emails from us. You may still receive emails to manage your account or important customer notices.

3.3.2.6. You can request a readable copy of the personal data we hold on you at any time. To do this, please email us via the DPO elaine.hinds@aliveleisure.co.uk

3.4. Transferring your information to a third party

3.4.1. If we sell or transfer all or part of our business, we may share or transfer customer records and data as part of the proposed/actual sale or transfer. Before we do this we will ensure there is adequate protection in place to ensure the security and confidentiality of your data.

3.4.2. We are proposing to sell part of the business and transfer your data to the Borough Council of King's Lynn and Alive West Norfolk in accordance with clause 3.4.1 above.

3.5. How long do we keep your data for?

3.5.1. Alive Leisure will not retain your personal information longer than necessary. We will hold onto the information you provide either while your account is in existence, or as needed to be able to provide the services to you, or (in the case of any contact you may have with our Customer Service team which may include staff based at our sites, Alive Card Services or Head Office) for as long as is necessary to provide support-related reporting and trend analysis only.

3.5.2. If legally required or if it is reasonably necessary to meet regulatory requirements, resolve disputes, prevent fraud and abuse, or enforce our Terms and Conditions, we may also retain some of your information for a limited period of time as required, even after you have closed your account or it is no longer needed to provide the Services to you.

4. The website

Alive Leisure, as the website owner and the Borough Council of King's Lynn and West Norfolk as the third party data processor holding and managing the Alive Leisure website, take a proactive approach to user privacy and ensure the necessary steps are taken to protect the privacy of its users throughout their visiting experience. The Alive Leisure website complies with all UK national laws and requirements for user privacy.

5. Use of cookies

5.1. What are cookies?

A cookie is a small file of letters and numbers that we put on your computer, phone or other device that you use to browse our Site, if you agree. Cookies have many uses, but fundamentally they are used to store information about your visit to our website. This allows the website, through its server to provide the users with a tailored experience within this website.

5.2. What do we use cookies for?

- 5.2.1. We may use cookies to remember personal settings you have chosen at our website. In no other context do we use cookies to collect information that identifies you personally. Most of the cookies we set are automatically deleted from your computer when you leave our website or shortly afterwards.
- 5.2.2. We use anonymous session cookies (short-term cookies that disappear when you close your browser) to help you navigate the website and make the most of the features. If you log into the website, application or a course as a registered user, your session cookie will also contain your user ID so that we can check which services you are allowed to access.
- 5.2.3. The Alive Leisure website uses tracking software to monitor its visitors to better understand how they use it. This software is provided by Google Analytics which uses cookies to track visitor usage. The software will save a cookie to your computer's hard drive in order to track and monitor your engagement and usage of the website, but will not store, save or collect personal information.
- 5.2.4. Should users wish to deny the use and saving of cookies from this website onto their computer's hard drive, they should take necessary steps within their web browser's security settings to block all cookies from the Alive Leisure website and its external serving vendors.

5.3. Cookies we use

- 5.3.1. We use two types of cookies on our website:
- 5.3.2. Session cookies – These are temporary cookies that are deleted after each time you visit our Site.
Persistent cookies – These remain in place on your device after your visit to our Site, to allow your preferences or actions to be remembered.

5.4. EU cookie directive

From 26 May 2011 a new European Union directive required all websites to gain the consent of our users to download cookies on to their machines. On 24 May 2012, the Information Commissioner's Office (ICO) released new guidance which said that a website can operate with cookies through 'implied consent.'

5.5. Implied consent

- 5.5.1. There are various methods available to use to gain users consent but we consider these solutions as obtrusive. We want our users to find information and services quickly, and following the ICO's May 2012 release, we have taken the decision to promote how we use cookies on our website and provide you with enough information to control your own settings.
- 5.5.2. Implied consent means that by using our website, you agree to cookies being set. If users want to disable cookies, this policy talks you through how to do this.

5.6. How to disable cookies

- 5.6.1. If you do not want to receive cookies from our Site, you can change your cookie settings under the privacy settings in your browser options. Under your browser

settings you can also delete individual cookies or any cookies that your browser has stored.

5.6.2. You can find more information on how to delete and control cookies at <http://www.aboutcookies.org>

5.6.3. If you set your browser to refuse cookies, please be aware that there may be functionality issues on our site and other websites which may result in the sites not working.

5.7. Use of IP addresses

When we collect IP addresses it is only for system administration and to monitor the use of our site. Our IP link does not provide personal identification and so your use of our Site will remain anonymous.

5.8. Links to other websites

Our Site may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and we do not accept any responsibility or liability for such policies. Please check these policies before you submit any personal data to these websites.

6. Updating our Privacy Notice

Please note, we are constantly reviewing how we process and protect data. Therefore, changes to our policy may occur at any time. We will endeavour to publicise any changes. Our current policy will be live on our website.