



Privacy Notice

1. Who We are.

Colfe's Leisure Centre Limited operates as the commercial arm of Colfe's School, however trades independently. Our registered office is located at Upwood Road, Lee, London SE12 8AA, registered in England under Company No 2586190. This policy describes the types of personal information that we may collect about you, the purposes for which we use the information, the circumstances in which we may share the information and the steps that we take to safeguard the information to protect your privacy.

All personal information is controlled by Colfe's Leisure Services Limited (CLS)

2. What is this Privacy Policy For

This policy is intended to provide information about how CLS will use (or "process") personal data about individuals including: its staff, its current, past, and prospective members, guests, and affiliates.

This information is provided because Data Protection Law gives individuals rights to understand how their data is used. Members, staff, Guests, and Affiliates are all encouraged to read this Privacy Notice and understand the centres obligations to its entire community. The leisure centre needs to process personal data as part of its everyday operations.

This Privacy Notice applies alongside any other information the leisure centre may provide about a particular use of personal data, for example when collecting data via an online or paper form. This Privacy Notice also applies in addition to the leisure centres other relevant terms and conditions and policies, including.

- Membership Terms and Conditions
- CCTV Policy
- Safeguarding and First Aid policies
- Image and Photography Policy
- The leisure centres safeguarding, or health and safety policies, including as to how concerns or incidents are recorded.

Anyone who works for, or acts on behalf of, the leisure centre (including staff, volunteers, third party providers and service providers) should also be aware of and comply with this Privacy Notice.

3. Responsibility For Data Protection

The Leisure Centre has appointed the Operations Manager to deal with requests and enquiries concerning the centres use of your personal data (see section on Your Rights below) and to endeavour to ensure that all personal data is processed in compliance with this policy and Data Protection Law. The Operations Manager can be contacted via email for issues arising from this notice at leisurecentre@colfes.com or via post to the Leisure Centre.



4. Why the Leisure Centre Needs to Process Personal Data

In order to carry out its ordinary duties to staff, Members, Guests, Hires and other affiliates the Leisure Centre needs to process a wide range of personal data about individuals (including current, past, and prospective members, Guest, Hires and other affiliates) as part of its daily operation. Some of this activity the Leisure Centre will need to carry out in order to fulfil its legal rights, duties or obligations for example those made under a contract with its staff, members, guests, hires or affiliates.

Other uses of personal data will be made in accordance with the Leisure Centres legitimate interests, or the legitimate interests of another, provided that these are not outweighed by the impact on individuals and provided it does not involve special category data (see details below).

The processing of personal data by the Leisure Centre in accordance with its legitimate interests includes but is not limited to:

- Name and Contact Details of member and guests, to ensure the setup of a membership.
- Date of Birth to ensure the correct membership category is obtained.
- Bank /Credit Card details to ensure the correct payments can be made.
- Name and contact details of family members (For family memberships, including those under 18 years).
- Images of members.
- The use of security, including CCTV in accordance with the School's CCTV Policy.

In addition, the centre will on occasion need to process sensitive or special category personal data. This may include data about an individual's race or ethnic origin, religious beliefs, sexual life, criminal records and proceedings, trade union membership and relevant medical information including details of an individual's physical and mental health, in accordance with rights or duties imposed on it by law, including as regards safeguarding and employment or from time to time by explicit consent where required. These reasons will include:

- To safeguard members' welfare and provide appropriate care (and where necessary, medical) care and to take appropriate action in the event of an emergency, incident or accident, including by disclosing details of an individual's medical condition or other relevant information where it is in the individual's interests to do so: for example for medical advice, , safeguarding, and cooperation with police or social services, for insurance purposes or to organisers of Leisure Centre events who need to be made aware of medical needs;
- We do not collect personal information from individuals under 18 years of age without the permission of their parent or guardian, however this data is requested for family memberships, which is imputed by the parent, guardian, or carer.



5. Types of Personal data Processed by Colfe's Leisure Centre

This will include by way of example:

- Names, addresses, telephone numbers, e-mail addresses and other contact details.
- Bank and/or credit card details.
- where appropriate, information about individuals' health and welfare, and contact details for their next of kin.
- images of members (and occasionally other individuals), and images captured by the School's CCTV system (in accordance with the taking, storing, and using images of children and CCTV policies.
- Photographs for your membership profile.
- Survey Results
- Physical Activity Readiness Questionnaire and Health Statements

6. How Colfe's Leisure Centre Collects Data

Generally, the Leisure Centre receives personal data from the individual directly. This is primarily via our membership system, Perfect Gym and swim academy booking system, I Class Pro, however, may be via a form, or simply in the ordinary course of interaction or communication such as email. However, in some cases personal data will be supplied by third parties, for example hires.

7. Who Has Access to Personal Data and Who Colfe's Leisure Centre Shares it With

For the most part, personal data, collected by the Leisure Centre will remain within the Leisure Centre and will be processed by appropriate individuals only in accordance with access protocols (i.e. on a 'need to know' basis). Particularly strict rules of access apply in the context of:

- Banking/Payment Details

Staff, Members, Guests and all other affiliates are reminded that Colfe's Leisure Centre is under duties imposed by law and statutory guidance (including Keeping Children Safe in Education) to record or report incidents and concerns that arise or are reported to it, in some cases regardless of whether they are proven, if they meet a certain threshold of seriousness in their nature or regularity. This is likely to include file notes on personnel or safeguarding files, and in some cases referrals to relevant authorities such as the LADO or police. For further information about this, please view the Leisure Centres Child Protection (Safeguarding) and Staff Code of Conduct Policy.

Finally, in accordance with Data Protection Law, some of the Leisure Centres processing activity is carried out on its behalf by third parties, such as IT systems, web developers or cloud storage providers. This is always subject to contractual assurances that personal data will be kept securely and only in accordance with the Leisure Centres specific directions.



Photographs For Membership Profiles

To prevent fraudulent use of your membership, we require a photograph. This stays on a secure system and is only visible by staff members, and not used for any other purpose.

8. How Long do we Keep personal Data

The Leisure Centre will retain personal data securely and only in line with how long it is necessary to keep for a legitimate and lawful reason. Typically, the legal recommendation for how long to keep ordinary staff files is up to 7 years following departure from the Leisure Centre. However, incident reports and safeguarding files will need to be kept much longer, in accordance with specific legal requirements. In particular, there are currently requirements in relation to the Independent Inquiry into Child Sexual Abuse to maintain many records whilst the inquiry is ongoing.

9. Your Rights

Rights of access

Individuals have various rights under Data Protection Law to access and understand personal data about them held by Colfe's Leisure Centre, and in some cases ask for it to be erased or amended. These rights are however subject to certain exemptions and limitations.

Any individual wishing to access or amend their personal data or who has some other objection to how their personal data is used, should put their request in writing to the Leisure Centre Operations Manager. Colfe's Leisure Centre will endeavour to respond to any such written requests as soon as is reasonably practicable and in any event within statutory time-limits which is one month in the case of requests for access to information. The Leisure Centre will be better able to respond quickly to smaller, targeted requests for information. If the request for information is manifestly excessive or similar to previous requests, the Leisure Centre may ask you to reconsider or require a proportionate fee (but only where Data Protection Law allows it).

Requests that cannot be fulfilled

You should be aware that the right of access is limited to your own personal data and certain data is exempt from the right of access. This will include information which identifies other individuals, or information which is subject to legal privilege (for example legal advice given to or sought by Colfe's Leisure Centre, or documents prepared in connection with a legal action).

10. Data Accuracy and Security

The Leisure Centre will endeavour to ensure that all personal data held in relation to an individual is as up to date and accurate as possible. Individuals must please notify Colfe's Leisure Centre of any significant changes to important information, such as contact details or payment details, held about them.

An individual has the right to request that any out-of-date, irrelevant, or inaccurate or information about them is erased or corrected (subject to certain exemptions and limitations under Data



Protection Law): please see above for details of why Colfe's Leisure Centre may need to process your data, of who you may contact if you disagree.

Colfe's Leisure centre will take appropriate technical and organisational steps to ensure the security of personal data about individuals. All staff will be made aware of this policy and their duties under Data Protection Law and receive relevant training.

11. This Policy

The Leisure Centre will update this Privacy Notice from time to time. Any substantial changes that affect your rights will be provided to you directly as far as is reasonably practicable.

If an individual believes that Colfe's Leisure Centre has not complied with this policy or acted otherwise than in accordance with Data Protection Law, they should notify the Operations manager at leisurecentre@colfes.com.

12. Cookies

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. This website makes use of cookies to monitor visitor sessions. No personal information is stored in the cookie that is issued by the site. The value stored in the cookie is an anonymous identifier, which is not linked to any other personal information you may give us during your visit. If you do not wish to receive these cookies you can disable them in your browser, though doing so may affect the functionality of our website. Most web browsers allow some control of cookies 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.allaboutcookies.org.

First party cookies: these are our own cookies, controlled by us and used to provide information about usage of our site.

Third party cookies: these are cookies found in other companies' internet tools, which we are using to enhance our site, for example Facebook or Twitter have their own cookies, which are controlled by them.

First party cookies

We may collect technical data about the type of Internet browser and computer operating system that you use, and also which pages you visit and interact with. This information does not identify you as an individual and is used only for tracking site use so that we can improve your experience on the site. We might also place a "cookie" on your hard drive that will help us to identify you when you return to the site and allow us to tailor content to your personal preferences. If you do not wish to use "cookies" you may disable this option in your Internet browser settings. "Cookies" can be removed from your computer. Colfe's Leisure Centre uses Google Analytics to collect this type of data.



About the Google Analytics Cookies

Google Analytics sets first party cookies via a piece of JavaScript code which must be added to every page that site owners want to track. It sets four cookies automatically, and a fifth via opt-in (this relates to sharing information about your traffic with Google).

Globally and in the European Union member states Google sets the following cookies:

[utma Cookie](#)

A persistent cookie – remains on a computer, unless it expires, or the cookie cache is cleared. It tracks visitors. Metrics associated with the Google __utma cookie include: first visit (unique visit), last visit (returning visit). This also includes Days and Visits to purchase calculations which afford ecommerce websites with data intelligence around purchasing sales funnels.

[utmb Cookie & __utmc Cookie](#)

These cookies work in tandem to calculate visit length. Google __utmb cookie demarks the exact arrival time, then Google __utmc registers the precise exit time of the user.

Because __utmb counts entrance visits, it is a session cookie, and expires at the end of the session, e.g. when the user leaves the page. A timestamp of 30 minutes must pass before Google cookie __utmc expires. Given __utmc cannot tell if a browser or website session ends. Therefore, if no new page view is recorded in 30 minutes the cookie is expired.

This is a standard 'grace period' in web analytics. Ominture and WebTrends among many others follow the same procedure.

[utmz Cookie](#)

Cookie __utmz monitors the HTTP Referrer and notes where a visitor arrived from, with the referrer siloed into type (Search engine (organic or cpc), direct, social and unaccounted). From the HTTP Referrer the __utmz Cookie also registers, what keyword generated the visit plus geolocation data.

This cookie lasts six months. In tracking terms this Cookie is perhaps the most important as it will tell you about your traffic and help with conversion information such as what source / medium / keyword to attribute for a Goal Conversion.

[utmv Cookie](#)

Google __utmv Cookie lasts "forever". It is a persistent cookie. It is used for segmentation, data experimentation and the __utmv works hand in hand with the __utmz cookie to improve cookie targeting capabilities.

Third party cookies

Throughout our website we have links to third party social media websites such as Facebook and Twitter. Pages with this embedded content may present cookies from these websites over which Colfe's Leisure Centre has no control. You should check the relevant third-party website for more information about how these cookies are controlled.