

# **Aspire@Southfields PRIVACY POLICY July 2018**

## **1. Aspire@Southfields and protecting your data**

Data protection law asks every company to make it clear who is responsible for looking after your personal data, so here are our details:

The websites [www.aspiresouthfields.com](http://www.aspiresouthfields.com) is owned and operated by Aspire@Southfields. We are registered in England and Wales under company number 08068707, and in Charities Commission under charity number 1149367, we have our registered office at 333 Merton Road, SW18 5JU.

Aspire@Southfields is data processor of the data collected from you.

We take our data protection responsibilities very seriously and we comply with all applicable Data Protection Legislation in force. For the purposes of this Privacy Notice, "**Data Protection Legislation**" means: (i) the Data Protection Act 1998 ("**DPA**") or (ii) the EU Regulation 2016/679 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (General Data Protection Regulation) ("**GDPR**") and any laws in England giving effect to its provisions.

Please read this privacy policy carefully as you are consenting to it by providing us with your personal data.

### ***Who is Aspire@Southfields?***

Aspire@Southfields is a Sport and Community centre to contribute positively to the cultural, social and economic lives of the residents of the Borough of Wandsworth. .

If you have any questions or concerns about who we are or how we process your personal data then do please contact us at [info@aspresouthfields.com](mailto:info@aspresouthfields.com)

## **2. Our legal basis for collecting and processing your data**

We at Aspire@Southfields collect and process your data on the basis that we clearly set out how we are going to collect and use your data in this privacy policy; where we have a contractual obligation to deliver you a product or

service; or that you consent to such collection and processing when you register with us.

If at any time you wish to change your details or close your account you can do so by contacting us. See section 13) 'Your Rights and Choices'.

### ***Contractual***

If you buy a product or service, even if it's an assessment session, we have a contractual obligation to provide you with that product or service. We will therefore store and process your data as per this privacy policy and contact you in relation to your purchase for as long as is necessary, e.g. as long as you remain a customer; or in the case of a free trial for 7 days after, during which time we'll ask if you want to sign up.

### ***Consent***

When we collect your data we will ask you to confirm you consent to this Privacy Policy. We will also ask if you'd like us to send you marketing emails with information about classes, offers, products and other news. We will only then send you these marketing emails if you opt in.

## **3. What is 'personal data'?**

Personal data is any information which personally identifies you or your child. This might include your name, address or email address. We may also ask for your child's name or date of birth. The information we collect about you and your child will be processed in accordance with this policy.

## **4. How Aspire@Southfields gather personal data?**

The main places that we gather personal data are:

- when you enrol for classes, or register for a free assessment.
- when you complete a paper membership registration form .
- when you give your details over the phone to one of our members of staff when booking or enquiring about classes or a party
- When you purchase any product/service from our online booking system mindbody.com, face to face or over the phone
- when you enter a promotion, or survey
- when you report a problem with the Website or contact us regarding a complaint or enquiry

- when you use the Aspire@Southfields website ([www.aspiresouthfields.com](http://www.aspiresouthfields.com)) and we use tracking devices (known as cookies) to track your web visit.

## **5. Protecting yours and your child's privacy**

In order to provide you with relevant information about classes or a party for your child we need to know:

- your child's age or date of birth
- your child's name

## **6. The data that we seek to collect from you**

At Aspire@Southfields we send emails to you with information about classes, products and services that may be relevant to you and your children.

To do this we ask you to tell us your:

- name
- email address
- postal address
- consent to receiving communications from us
- child's name
- child's age or date of birth

### ***Data that helps us to measure the interest and response to our emails***

At Aspire@Southfields we want to understand whether you are opening our emails and where relevant, clicking on links within the emails that take you to our website. We do this because we want to learn which emails you find interesting and engaging. We also want to be able to identify people who have stopped opening emails for a period of time, so that we can try and encourage them to start engaging with us again or delete them from our database.

### ***Data we need to retain to answer or resolve an enquiry or complaint***

If you contact us with a complaint or enquiry we may keep a record of that correspondence to ensure that we can deal with it effectively.

### ***Data that you share with us in response to a survey***

We may also ask you to complete surveys that we use for research purposes, to better understand your opinions, preferences and interests. For example, we might ask you about your interests and your satisfaction with our products, website, communications or service. Participation in such surveys is always voluntary.

## **7. How we store and protect your personal data?**

We have appropriate security measures in place to prevent personal information from being accidentally lost or used or accessed in an unauthorised way. We limit access to your personal information to those who have a genuine business need to know it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

Please note: In common with all other website owners we cannot guarantee the security of data that you transmit to us over the internet. The transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to the website; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

## **8. How we use your personal data?**

When you give us information, such as your name, email address and child's date of birth, we use it in the following ways:

- to process your purchase of classes, products or services from Aspire@Southfields
- to send you relevant emails about our classes, products or services, and other news, if you have consented to this
- we may use your data to notify you about changes to our service or our privacy policy, or to give you notice that we will delete your data, unless you consent to continuing to receive communications
- we may use your data to optimise the Website for your use, in terms of geography or device

## **9. How long we will hold your data?**

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

As a provider of classes, products and services for families in general, we will hold your data for 5 years. After this period we will treat it as confidential waste.

## **10. Who will see your data?**

Aspire@Southfields values your privacy and will only share your data with other parties in very specific and limited circumstances. These are explained in this section:

### ***We may share your information with selected group companies and third parties***

We use software from carefully selected third parties and group companies to enable us to manage your data, publish the websites, deliver the classes, collect reviews and communicate with you. The current list of suppliers are:

Mindbody: Online booking system.

Southfields Academy: data management and communications support for Aspire@Southfields

Mailchimp: Email marketing service.

Squarespace: Website hosting.

We will not share your personal data with any third parties for their marketing purposes.

We will share personal information with law enforcement or other authorities if required by applicable law.

## **11. Your Rights and Choices**

### ***You can choose whether to receive marketing communications***

Aspire@Southfields uses personal data to send subscribers emails with details about our classes, products, services and other news or offers that we think could be relevant to parents and members in general.

When we collect your data, we will ask if you want to receive these emails and only send them if you say yes. If you would like to opt-out of marketing communications, you can do this by contacting us or clicking on the unsubscribe link at the bottom of any of our marketing emails.

However, we will continue to send you emails in order to fulfil our contractual obligations to you, regardless of whether you opt in to marketing communications. These include when you place an order for goods or services with us.

### ***You can choose to correct, update or delete your information***

Just get in touch with us to update your details, have a copy, or ask for them to be deleted.

### ***You can find out more about your rights under Data Protection***

For more information about your rights under the Data Protection Act and the General Data Protection Regulation (GDPR) go to the website of the Information Commissioner's Office at [ico.org.uk](http://ico.org.uk).

### ***If you have a complaint about Aspire@Southfields data processing:***

Please contact us if you have any questions or concerns about how we collect, store and use your personal data.

The General Data Protection Regulation also gives you the right to lodge a complaint with the UK Information Commissioner who may be contacted at [www.ico.org.uk/concerns](http://www.ico.org.uk/concerns) or telephone: 0303 123 1113.

## **12. Links to other websites**

The Website may, from time to time, contain links to other websites. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

### **13. Keeping you up to date with changes to our privacy policy**

Any changes we may make to our Privacy Policy in the future will be posted on this page and, where appropriate, notified to you by email. Please check back frequently to see any updates or changes.

### **14. What to do if you have further questions?**

If you have any questions or concerns with respect to this policy or the website you may contact us by email at [info@aspresouthfields.com](mailto:info@aspresouthfields.com)