

Company Name:	Vision Health and Fitness Club Limited (“the Company”)
Policy Name:	Privacy Policy
Document No.	VIS-POLY-012
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PRIVACY POLICY

Vision Health and Fitness Club Limited understands that your privacy is important to you and that you care about how your information is used and shared. We respect and value the privacy of everyone who uses Our Facilities, becomes a Gym Member or visits Our Website, www.visionhealthandfitness.co.uk, and will only collect and use information in ways that allow us to provide our services to you, are useful to you and in a manner consistent with your rights, the consent you have given us and Our obligations under the law.

We seek to ensure the highest standards of compliance with UK data protection laws and regulations, as governed by ***The General Data Protection Regulation (EU) 2016/679*** and ***The Privacy and Electronic Communications (EC Directive) Regulations 2003***.

This Privacy Policy explains how, in keeping with the above legislation, Vision Health and Fitness Club Limited collects, processes and protects any personal data and information that you give to us when you use our Facilities, become a Gym Member or use our Website, your rights regarding how and why your data is processed and how to contact us regarding any data we may hold about you.

For the purposes of the General Data Protection Regulation (EU) 2016/679, the data controller is Vision Health and Fitness Club Limited.

This Privacy Policy is incorporated in and is subject to the Vision Health and Fitness Club Ltd Terms and Conditions. When you become a Gym Member (as defined below), use Our Facilities as part of a free trial, by using Our Website or otherwise using Our Services you indicate that you agree that we may use your Data (as defined below) in accordance with this Privacy Policy.

DEFINITIONS AND INTERPRETATIONS

In this Policy the following terms shall have the following meanings:

“Gym Member”	means a person with a paid membership that allows access to Our Facilities and use of Our Equipment;
“Our Facilities”	means any premises owned or operated as a gym by Vision Health and Fitness Club Limited
“Our Services”	means any gym memberships, classes, boot camps or personal training operated by or on behalf of Vision Health and Fitness Club Limited
“Cookie”	means a small text file placed on your computer or device by Our Site when you visit certain parts of Our Site and/or when you use certain features of Our Site. Details of the Cookies used by Our Site are set out in our Cookie Policy along with guidance and your rights to accept or refuse them;
“Our Site”	means the website, http://www.visionhealthandfitness.co.uk ;
“UK and EU Cookie Law”	means the relevant parts of the Privacy and Electronic Communications (EC Directive) Regulations 2003 as amended in 2004, 2011 and 2015;
“GDPR”	means the General Data Protection Regulations (EU) 2016/279;
“We/Us/Our”	means Vision Health and Fitness Club Limited; and
“Membr”	means Fit Cloud Technology Limited.

INFORMATION ABOUT US

Our site, <http://www.visionhealthandfitness.co.uk>, is owned and operated by Vision Health and Fitness Club Limited, a limited company registered in England under 08362823, registered address Vision Health and Fitness Club Limited, Unit 2 Sands Industrial Estate, Swalwell, Newcastle upon Tyne, NE16 3DJ. Our Data Protection Registration Number is ????????

We are a member of UK Active

WHAT DOES THIS POLICY COVER

This Privacy Policy applies only to your use of Our Facilities, Our Services and Our Site. It does not extend to any websites that are linked to from Our Site (whether We provide those links or whether they are shared by other users). We have no control over how your data is collected, stored or used by other websites and we advise you to check the privacy policies of any such websites before providing any data to them.

YOUR DATA

Your “Data” means any information that we collect about you or any information that you provide to us. This includes information by which you may be personally identifiable, including, without limitation, your name, address, telephone number, email address, financial details, comments posted to us or submitted online, photos and other information from which you can be identified and which you may disclose to us when you use our services, our facilities or our website at any time. We will also collect a Biometric Fingerprint Scan when you join our facilities on a gym membership. This data is classed as “sensitive personal data” and we ensure that the necessary steps have been taken to safeguard this and all other personal data.

THE INFORMATION YOU GIVE US.

When you take out a membership with us you have to provide us with the following data:

- Full name
- Address
- Date of birth
- Phone number including Mobile
- Email address
- Payment and/or Banking details
- Biometric fingerprint scan
- Emergency contact name and number
- How you heard about us

When you apply for or have a free trial in the gym you must provide us with the following data:

- Full name
- Address
- Date of birth
- Phone number including Mobile
- Email address
- How you heard about us

You may also give us information when filling in forms on our site www.visionhealthandfitness.co.uk (Our Site), using our mobile app (provided by Membr, see the next section of this policy “How do we use the data you give us?” for more details on third parties we use) or by corresponding with us by phone, email or otherwise.

THE INFORMATION WE MAY COLLECT FROM YOU.

In the course of using our services, facilities, website and mobile app we may collect various types of information from you. This is data is collected and processed to allow us to improve our services to you and to help us identify areas that we can improve on.

We may collect information from you every time you visit our premises and access our facilities using your fingerprint, we may log the time, dates and frequency of your visits.

When you visit our site or use our app we may automatically collect the following information:

- technical information including, your IP address, your login information, browser type and version, browser plug-in types and version, operating system and platform including the type of device you are visiting our site on.
- information about your visit, including the URL clickstream to, through and from our site (including date and time) this means how you came to our site, what pages you visited and what page you left our site from. Products and/or services you searched for on our site, page response times, download errors, length of visits to pages, page interaction (such as scrolling, clicks and mouse overs), and methods used to browse away from the page.

We may from time to time receive information about you from other sources. This may include third parties that we work closely with including, for example, business partners, sub-contractors in technical, payment, Direct Debit collection and delivery services, advertising networks, analytics providers and search information providers.

HOW DO WE USE THE DATA YOU GIVE US?

We use the data that we hold about you in the following ways:

Contractual basis:

When you join our gym as a gym member you must provide us with certain personal and sensitive data. We collect and process this data solely to administer your membership and access to our facilities. This includes to;

- manage your access to the gym through our Membership management software and Biometric Fingerprint Access Control System;
- manage your membership subscription;
- contact you about any problems with your membership;
- contact you regarding any changes to our terms and conditions; and;
- manage your payments and Direct Debits.

To best enable us to fulfill our contractual agreement with you and provide the best possible service to you throughout your membership, we use 3 key strategic third party service providers who are also required process some or all of your data in order to provide their services to us. We have reviewed all their respective privacy policies to ensure that they all comply with the latest data and privacy legislation and will continue to review them annually for compliance. We have strict legal contracts in place with them stipulating that your data may only be used in accordance with the consent that you grant to us over your data. This is to ensure that your data privacy and security is respected and legally complied with at all times. Our three partners, why we use them and how they process your data are listed below.

Our Membership Management Software, Class Booking System and Mobile App (Membr) are provided by:

(Membr) Fit Cloud Technology Limited,
Suite 12, The Granary,
50 Barton Road,
Worsley,
Manchester,
M28 2EB.

Membr provide us with cloud based software that enables us to manage your membership details and your class bookings through a secure online portal. When processing this data for this

purpose, Membr acts as joint data controllers over your data with us. Membr may contact you from time to time with information about changes and/or updates to their services or products, which you may use as part of your contract with us. To review the Membr Privacy Policy please [click here](#). If you would like to query anything regarding your data that Membr processes you can write to them directly at the address above.

Our Direct Debit collection services are provided by:

Harlands Group
2nd Floor, Rockwood House,
9-17 Perrymount Road,
Haywards Heath,
West Sussex,
RH16 3TW.

Harlands processes your data for the purpose of direct debit collections on our behalf and collections of unpaid membership fees. Harlands acts as a joint data controller over your data with us. They may contact you regarding any matter relating to the payment of your membership including, but not limited to, late payments, missed payments, end of contract, termination and updates to their services and/or terms and conditions. You can review the Harlands Group Privacy Policy by [clicking here](#). If you would like to query anything regarding your data that Harlands processes you can write to them directly at the address above.

Our Biometric Fingerprint Access Control System is provided by:

Nomical Limited,
1st Floor, No1 Spinningfields,
Quay Street,
Manchester,
M3 3JE.

Nomical provide us with our access control system that enables us to provide unmanned access points to the gym for our members while restricting unauthorized access. Doing so also allows us to have a record of who is in our facility at any time in the event of a fire or emergency. Nomical may only process your data for the purposes of access control. If you would like to review Nomicals Privacy Policy, please [click here](#).

Legitimate Interests:

As part of our services to you, we may from time to time contact you regarding any changes and/or updates to our facilities that we feel you would reasonably expect to receive from us. When processing your data for this purpose we will ensure that doing so does not impact your rights or put your privacy at risk. Our key third party service providers, listed above, may also contact you regarding their services that they provide on our behalf as part of our contractual agreement. The reasons we may contact you under this basis are;

- to inform you of any changes and/or maintenance to our facility;
- to inform you of any changes to our services that may affect you;
- to inform you of any amendments to our class timetable, including the addition or removal of classes;
- to inform you of any cancellations of classes, group PT sessions or individual PT sessions.

When we contact you under this basis you will be able to 'Opt-out' of receiving this type of information by clicking the link provided when we contact you. We will never contact you regarding promotions or for any other marketing purposes, other than for those listed above under this basis.

Consent Basis:

When you sign up for a membership with us, apply for a free trial or contact us via Our Site, you will be given the option to 'Opt-in' to receive marketing and promotional material from us and/or our key third party partners, Membr, Harlands and Nomical. If you choose to 'Opt-in' we may from time to time contact you with promotions, offers or other relevant information. We know how annoying it can be to receive incessant marketing from companies and we prefer to take a non-intrusive ethical approach to our marketing, in keeping with this, we will do our best to limit the amount of times that we contact you and keep the content relevant to the original purpose behind you giving us your data. You have the right to 'Opt-out' of any future marketing at any time after you have given your consent by clicking the unsubscribe link that will be present in any contact we may have with you. If you do not 'Opt-in' or choose to 'Opt-out' at a later date then we will not contact you again with any marketing material. We may still contact you under the above mentioned reasons (Contractual or legitimate) if you are a member of Our Facility.

WHERE DO WE STORE YOUR DATA AND HOW LONG DO YOU KEEP IT?

Storing information and data securely is a costly process, maintaining it is a time consuming one, therefore, we do not want to hold your data any longer than is necessary, it is better for us and better for you. We only keep your data for as long as we need to in order to use it in keeping with the lawful basis under which we process it, and/or for as long as we have your permission to keep it, or for as long as we are required to in order to fulfill a legal obligation. Once we no longer have reason to hold your data it will be completely and securely erased from our systems.

The data that we collect from you will only be stored within the European Economic Area ("EEA") and will not be transferred outside the EEA unless this is required in order for us to provide our services to you. In any event, your data will only ever be transferred to organisations where an approved code of practice, in relation to data protection, is adopted and who meet the legal requirements as set out in the GDPR. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy. By submitting your information you consent to these transfers for the purposes specified above.

Data security is of great importance to us, and to protect your data We have put in place suitable physical, electronic and managerial procedures to safeguard and secure data collected by us or given to us.

Security measures we have put in place to protect personal data are:

- firewalls
- anti-Virus software
- browser certification technology / SSL certificates
- encryption
- restricted physical access
- use of strong passwords
- 128/256bit secure cloud based data storage/processing facilities

Only employees who are trained to access and require access to the information to perform a specific job are granted access to your information. Access to your data is limited and restricted to only what is required to perform the specific job. Records and logs of all access to personal data are collected and monitored to ensure compliance with this Policy.

Where we have given you (or where you have chosen) a password which enables you access to certain parts of our site and/or our mobile app, you are responsible for keeping this password

confidential. We ask you not to share a password with anyone.

Notwithstanding the security measures that we take, it is important to remember that the transmission of data via the internet may not be completely secure. While we do our best to ensure that any data transmitted to our site is secure, we cannot guarantee it is secure during that transmission and that you do so at your own risk. We advise you to take suitable precautions when transmitting to us data via the internet.

If you have any questions about the security at our website, you can send an email to our team at compliance@visionhealthandfitness.co.uk

DO WE SHARE YOUR DATA?

Sometimes we have to share your data in order for us to effectively provide our services to you. When we do so it will only be with the necessary consent from you and never without it. Provided that the necessary consent(s) has been given, we may share your information with selected third parties including:

- Business partners, suppliers and sub-contractors for the performance of any contract we enter into with them or you; and
- Advertisers and advertising networks that require the data to select and serve relevant adverts to you and others

We may share your personal information with any member of our group, which means our subsidiaries as defined in Section 1159 of the UK Companies Act 2006

We may disclose your personal information to third parties:

- In the event sell or buy any business or assets, in which case we may disclose your personal data to prospective seller or buyer of such business or assets.
- If Vision Health and Fitness Club Limited or substantially all of its assets are acquired by a third party, in which case personal data held by it about its customers we be one of the transferred assets.
- If we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or to protect the rights, property, or safety of Vision Health and Fitness Club Limited, our customers or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

YOUR RIGHTS OVER YOUR DATA AND HOW TO ACCES IT.

You have the right to ask us not to process your personal data for marketing purposes, this right is absolute and should you wish to do so you can at any time. We will always inform you (before collecting your data) if we intend to use your data for such purposes and/or if we intend to disclose your information to any third party for such purposes. You can exercise your right to prevent such processing by not checking the necessary boxes to give such consent on the forms we use to collect your data.

If you have provided consent for the processing of your personal information, you have the right (in certain circumstances) to withdraw that consent at any time which will not affect the lawfulness of the processing before the consent was withdrawn. You can withdraw your consent by clicking

the unsubscribe link provided in any email from us or by emailing us at compliance@visionhealthandfitness.co.uk.

You have the right at any time, to request to view a copy of, verify, update, amend or restrict the use of, any data that we may hold about you. You may also request that we permanently delete any data that we hold about you. If at any time you should want exercise these rights please email us at compliance@visionhealthandfitness.co.uk or alternatively write to us at Vision Health and Fitness Club Limited, Unit 2, Sands industrial Estate, Swalwell, Newcastle upon Tyne, NE16 3DJ. All requests will be processed within one month from the receipt of your request unless it is not reasonably possible for us to do so, in which case we will contact you to explain why this is the case.

Please note that the right to object to processing is not absolute and on occasion may be overridden by our need to comply with our legal or contractual obligations. In addition, your exercise of these rights may result in us being unable to fulfill our contractual obligation to you. If we refuse your objection regarding your data we will contact you explaining the reasons behind the decision.

If you have a complaint regarding the personal data we may hold about you and how we process it, please contact us by email at compliance@visionhealthandfitness.co.uk or in writing to Vision Health and Fitness Club Limited, Unit 2, Sands industrial Estate, Swalwell, Newcastle upon Tyne, NE16 3DJ. If you are not satisfied with our response or you believe we are not processing your personal information in accordance with the law, you can contact the **Information Commissioner's Office (ICO)**. This link will take you to the ICO's website: <http://www.ico.org.uk>

COOKIES

Our website uses cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our website and also allows us to improve our site. We also use cookies for tracking and advertising to provide us with performance, conversion and user analytics. We believe that you have the right to detailed information on the cookies we use and the purposes for which we use them and how you can disable them, as such we have created an individual Cookie Policy which can be found [here](#).

For more general information on cookies and how to disable them, please see www.allaboutcookies.org.

LINKS

This website contains links to other external websites. Please be aware that the Company is not responsible for the privacy practices of such other sites. We encourage you to be aware of this when you leave our site and to read the privacy statements of each and every website that collects personally identifiable information. This privacy statement applies solely to information collected by the Company's website.

CONTACTING US

If you have any questions about Our Site or this Privacy Policy, please contact us by email at: compliance@visionhealthandfitness.co.uk or by post at:
Vision Health and Fitness Club Limited, Unit 2, Sands industrial Estate, Swalwell, Newcastle upon Tyne, NE16 3DJ.

Please ensure that your query is clear, particularly if it is a request for information about the data we hold about you.

CHANGES TO OUR PRIVACY POLICY

Our Privacy Policy may change from time to time. Any changes we make to our Privacy policy will be posted on this page, and, where appropriate, notified to you by email. Please ensure that you check back frequently to see any updates or changes to our Privacy Policy.

The Management of Vision Health and Fitness Club Limited will ensure, through positive leadership, active participation and encouragement that all employees are motivated toward the aims of this policy.

As the Managing Director I have signed below to demonstrate the company's commitment to these aims.

Mark Clauzel

