



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, DPA 2018 GDPR, 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, DPA 2018 GDPR (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, DPA 2018 GDPR affords Data Subject certain rights and these are listed below for your convenience:-

- You have the right to have a copy of the information which we hold on you. A fee of £10 is payable for the information and unless there is a legitimate reason why you cannot make the application in writing, your request should be addressed in writing by letter or email, to the SLT contact shown below.
- You have a right to object to processing that is likely to cause, or is causing you damage or distress.
- You have a right to prevent processing for direct marketing; simply email or call us and we will stop sending marketing materials to you.



- You have a right to object to decisions being taken by automated means; although I can confirm we make no decisions on you using an automated process.
- You have a right in certain circumstances to have inaccurate personal data rectified, blocked, erased or destroyed.
- You have a right to claim compensation for damages caused by a breach of the Act.

You have given us permission to process your information, but you can withdraw your consent at any time. In certain situations, these rights may not apply, for example if you entered into a membership minimum term contract, we may have to write to you about your membership even if you asked us previously not to, but we would not send you any direct marketing communications.

Finally, if you are unhappy with how we have processed your information, you have the right to lodge a complaint with the Office of the Information Commissioner, contact details below.

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