



Sports Centre

(Canons Enterprises Limited)

**How We Use Your Information:
Privacy Notice for all Users of Canons Sports Centre
("Canons")**

Part of North London Collegiate School ("NLCS")

May 2018

Privacy Notice for All Users of Canons Sports Centre

Introduction

This notice is to help you understand **how** and **why** we collect personal information about you and **what** we do with that information. It also explains the decisions that you can make about your own information.

This notice applies to all users of the Sports Centre: child and adult members and non-members.

If you have any questions about this notice please contact the Canons Sports Centre Manger via CanonsSportsCentre@nlcs.org.uk or 020 8951 5402.

What is "personal information"?

Personal information is information that identifies you as an individual and relates to you.

This includes your contact details, next of kin and financial information. We may also hold information about any medical condition that might affect your ability to undertake activities in Canons.

Our legal bases for using your information

This section contains information about the legal bases that we are relying on when handling your information.

The two tables below contain a general description of the different legal bases but we have also used a colour code system so that you can see which bases we are relying on for each of the purposes described at paragraphs 1 to 20 below.

Legitimate interests ("L")

This means that Canons is using your information when this is necessary for Canons' legitimate interests except when your interests and fundamental rights override our legitimate interests.

Specifically, Canons has a legitimate interest in:

- providing health and fitness services to you or your child and to other people;
- safeguarding and promoting the welfare of you, your child, other Users and our employees;
- promoting the objects and interests of Canons. This includes using photographs of you undertaking activities in promotional material. It also includes making sure that we are able to enforce our rights against you, for example, so that we can contact you if unpaid fees are due;
- keeping Canons buildings safe;
- using your information in connection with legal disputes. For example, if you or your child bring a claim against Canons;
- protecting Canons' reputation;
- facilitating the efficient operation of Canons; and
- ensuring that all relevant legal obligations of Canons are complied with (for example in relation to inspections).

Necessary for contract ("CT")

We will need to use your information in order to perform our obligations under our contract with you and for you to perform your obligations as well. For example, we need your name and contact details so that we can update you on your child's progress and so that we can contact you if there is a concern.

Legal obligation ("LO")

Where Canons needs to use your information in order to comply with a legal obligation, for example to report a serious incident to the Health and Safety Executive. We may also have to disclose your information to third parties such as the courts, the local authority or the police where legally obliged to do so or our insurers.

Vital interests ("VI")

In limited circumstances we may use your information to protect your vital interests or the vital interests of someone else (e.g. if you or they are seriously hurt).

Performance of a task carried out in the public interest (or carrying out public tasks) ("PI")

The following are examples of when we use your information to perform tasks in the public interest:

- safeguarding and promoting your welfare, your child's welfare and the welfare of other Users;
- facilitating the efficient operation of Canons; and
- ensuring that we comply with all of our legal obligations.

Canons must also comply with an additional condition where it processes special categories of personal information. These special categories are as follows: personal information revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic information, biometric information, health information, and information about sex life or orientation.

Substantial public interest ("SPI")

Canons is also allowed to use special categories of personal information where doing so is necessary in the substantial public interest. This is similar to "public interest" in the table above.

Social protection and social security laws

Also Canons may use your information to comply with social protection law (e.g. to look after your child) and social security laws. Social protection law is concerned with preventing, managing, and overcoming situations that adversely affect people's wellbeing.

Vital interests ("VI")

In limited circumstances we may use your information to protect your vital interests or the vital interests of someone else (e.g. if you or they are seriously hurt).

Legal claims ("LC")

We are allowed to use your information if this is necessary in relation to legal claims. For example, this allows us to share information with our legal advisors and insurers.

How and why does Canons collect and use personal information?

We set out below examples of the different ways in which we use personal information and where this personal information comes from. The letters highlighted in different colours below refer to the legal bases we are relying on. Please see the section above for an explanation.

1. Canons' primary reason for using your personal information is to provide health and fitness services to you or your child - **LI**, **CT**, **PI**, **SPI**.
2. We use CCTV to make sure the Canons site is safe. Images captured of you via CCTV will be your personal information. CCTV is not used in private areas such as toilets - **LI**, **CT**, **PI**, **SPI**.
3. If there is a complaint or grievance made to Canons which involves you then we will use your information in connection with that complaint or grievance - **LI**, **PI**, **SPI**.
4. We may take photographs or videos of you undertaking Canons activities to use on social media and on the Canons website. This is to show prospective users what we do here and to advertise Canons. We may continue to use these photographs and videos after you or your child has left Canons - **LI**.
5. We will send you information to keep you up to date with what is happening at Canons. For example, by sending you information about events and activities taking place - **LI**.
6. We may use information about you if we need this for historical research purposes or for statistical purposes - **LI**.
7. We may use your information when ensuring network and information security, for example, our anti-virus software might scan files containing information about you - **LI**.
8. We can keep information about you for a very long time or even indefinitely if we need this for historical, research or statistical purposes. For example, information relating to incidents or accidents that have taken place at Canons - **LI**

Financial information

9. We will process financial information about you in relation to the payment of membership and activity fees - **LI**, **CT**.
10. We may share your information with debt recovery suppliers if you do not pay any fees owed to Canons - **LI**, **CT**.

Sharing personal information with third parties

11. In accordance with our legal obligations, we will share information with local authorities, the Independent Schools Inspectorate and the Department for Education, for example, where we have any safeguarding concerns or to comply with our legal obligations - **LI**, **LO**, **PI**, **SPI**.
12. On occasion, we may need to share your information with the police for the prevention and investigation of crime and the prosecution of offenders. We will only do this in specific circumstances to assist the police with their investigations - **LI**, **CT**, **LO**, **PI**, **SPI**.
13. We may need to share information about you with the Health and Safety Executive (a government organisation) if there is a health and safety issue at Canons - **LI**, **LO**, **PI**, **SPI**.

14. In certain circumstances, we may also need to share information with our legal advisers for the purpose of obtaining legal advice - **LI, LO, PI, SPI, LC**.
15. Occasionally we may use consultants, experts and other advisors to assist Canons in fulfilling its obligations and to help run Canons properly (e.g. our accountants). We will share your information with them if this is relevant to their work - **LI, CT, PI, SPI**.
16. Canons operates as a subsidiary of North London Collegiate School which is a charity, which means that in exceptional circumstances we may need to share your information with the Charity Commission e.g. in the event of a serious incident - **LI, LO, PI, SPI**.
17. We may share information about you with our insurance company, for example, where there is a serious incident at Canons - **LI, SPI, LC**.
18. We may need to share information if there is an emergency, for example, if you are hurt whilst on the Sports Centre premises - **LI, VI**.
19. We may send you information about Canons before you sign up for membership or for an activity. For example, we may send you a copy of a Canons prospectus. **LI**
20. We sometimes use contractors to handle personal information on our behalf. The following are examples: - **LI**.
 - 20.1 IT consultants who might access information about you when checking the security of our IT network; and
 - 20.2 we may use third party "cloud computing" services to store some information rather than the information being stored on hard drives located on Canons site.

Criminal offence information

We may only use information relating to criminal convictions and offences where the law allows us to do so. This will usually be where such processing is necessary to carry out our obligations or to exercise our rights.

Less commonly, we may use information relating to criminal convictions and offences where it is necessary in relation to legal claims, where it is necessary to protect our users and you are not capable of giving your consent, or where you have already made the information public.

More than one basis

As you will see from this notice, in some cases we will rely on more than one basis above for a particular use of your information. In addition, we may move from one of the legal bases listed above to another as circumstances change. For example, as a safeguarding matter becomes more serious, we may start to rely on legal obligation to share personal information with the local authority in addition to the other legal bases which are noted for safeguarding purposes.

Consent

We may ask for your consent to use your information in certain ways as an alternative to relying on any of the bases in the table above. For example, we may ask for your consent before taking or using some photographs and videos if the photograph or video is more intrusive and we cannot rely on legitimate interests. If we ask for your consent to use your personal information you can take back this consent at any time. Any use of your information before you withdraw your consent remains valid. Please speak to the Sports Centre Manager if you would like to withdraw any consent given.

Sending information to other countries

In certain circumstances, we may send your information to countries which do not have the same level of protection for personal information as there is in the UK. For example, we may store your information on cloud computer storage based overseas.

The European Commission has produced a list of countries which have adequate data protection rules. The list can be found here: https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/adequacy-protection-personal-data-non-eu-countries_en

If the country that we are sending your information to is not on the list, or is not a country within the EEA (which means the European Union, Liechtenstein, Norway and Iceland), then it might not have the same level of protection for personal information as there is in the UK.

We will provide you with details about the safeguards which we have in place outside of this privacy notice. If you have any questions about the safeguards that are in place please contact Sports Centre Manager.

For how long do we keep your information?

We keep your information for as long as we need to in order to educate and look after your child. We will keep some information after you or your child has left Canons, for example, so that we can find out what happened if you make a complaint.

In exceptional circumstances we may keep your information for a longer time than usual but we would only do so if we had a good reason and only if we are allowed to do so under data protection law.

Please see our Data Protection policy for more detailed information. This can be found on our website here <http://www.nlcs.org.uk/about-nlcs/canons-sports-centre/keeping-you-and-your-information-safe>.

What decisions can you make about your information?

From 25 May 2018 data protection legislation gives you a number of rights regarding your information. Some of these are new rights whilst others build on your existing rights. Your rights are as follows:

- **Rectification:** if information Canons holds about you is incorrect you can ask us to correct it.
- **Access:** you can also ask what information we hold about you and be provided with a copy. This is commonly known as making a subject access request. We will also give you extra information, such as why we use this information about you, where it came from and what types of people we have sent it to.
- **Deletion:** you can ask us to delete the information that we hold about you in certain circumstances. For example, where we no longer need the information.
- **Portability:** you can request the transfer of your information to you or to a third party in a format that can be read by computer. This applies where (a) the information has been provided by you; (b) the basis that we are relying on to process your information is consent or contract (please see "Our legal bases for using your information" above); and (c) the information is being processed by us on computer.
- **Restriction:** our use of information about you may be restricted in some cases. For example, if you tell us that the information is inaccurate we can only use it for limited purposes while we check its accuracy.
- **Object:** you may object to us using your information where:

- a. we are using it for direct marketing purposes (e.g. the Canons web site);
- b. the legal basis on which we are relying is either legitimate interests or performance of a task carried out in the public interest. Please see the section "Our legal bases for using your information" above; and
- c. we are using it for historical or scientific research purposes or archiving purposes. For example, we may keep photographs of you at a Canons event for historical reasons.

The Sports Centre Manager can give you more information about your data protection rights.

Further information and guidance

The Data Protection Lead is the person responsible at Canons for managing how we look after personal information and deciding how it is shared.

Like other organisations we need to keep your information safe, up to date, only use it for what we said we would, destroy it when we no longer need it and most importantly - treat the information we get fairly.

This notice is to explain how we use your personal information. The Sports Centre Manager can answer any questions which you may have.

This privacy notice does not, and is not intended to, give you any rights which you did not already have. For example, it does not give you any additional contractual rights.

Please speak to The Sports Centre Manager if:

- you object to us using your information for marketing purposes e.g. to send you information about Canons events. We will stop using your information for marketing purposes if you tell us not to; or
- you would like us to update the information we hold about you; or
- you would prefer that certain information is kept confidential.

If you fail to provide certain information when requested, we may not be able to perform our obligations under the contract we have entered into with you. We may also be prevented from complying with our legal obligations (such as to ensure the welfare of your child and their classmates).

If you consider that we have not acted properly when using your personal information you can contact the Information Commissioner's Office - ico.org.uk.