

1. Background

This privacy notice lets you know what happens to any personal data that you give to us, or any that we may collect from/ about you.

It applies to all services that we offer and instances where we collect your personal data.

This privacy notice applies to all personal information processed by or on behalf of EFP at any of our clubs.

Changes to this privacy notice

We may change this privacy notice from time to time to reflect changes in the law and/or any privacy practices that we may update.

We encourage you to check this privacy notice whenever you are notified of changes.

Energy Fitness Professionals and our Data Protection Officer

We are Energy Fitness Professionals, 29 Craven Court, Glebeland Road, Camberley, Surrey, GU15 3BS.

We are a data controller of your personal data.

The Fitness Centre which provides your product or service is named at the start of these terms and conditions.

We have a dedicated data protection officer (DPO). You can contact the DPO using the details above or by writing to the above address, marking it for the attention of the DPO.

2. What kinds of personal information about you do we process?

Personal information that we'll process in connection with all of our services, if relevant, includes:

Personal and contact details, such as title, full name, contact details, and contact details history

Your date of birth, gender, and/or age

Your marital status

Emergency contact details

Photograph and/or biometric fingerprints at sites using membership software and issuing membership cards

Records of your contact with us such as emails

The usage of our products and services which includes but is not limited to cholesterol and glucose testing, body stat appointments, personal training, and classes

Marketing to you, including history of those communications, whether or not you open them, and information about products and services. Communications on products and services includes but is not limited to cholesterol and glucose testing, body stat appointments, personal training, and classes

Information about your health

3. What is the source of your personal information?

We'll collect personal information from the following sources:

- From you directly
- Information generated about you when you use our services

We do not request information about you, or pass your information on to, any third parties.

4. What do we use your personal data for?

We use your personal data, including any of the personal data listed above for the following purposes:

- Assessing your application for the Fitness Centre
- Assessing your application for any of our products or services
- Updating your records
- To perform our products or services
- To monitor and to keep records of our communications with you and our staff
- For direct marketing communications to help us to offer you relevant products and services. We'll send marketing to you by email, phone, and post. Some Fitness Centres may also use SMS, social media and digital channels (for example using Facebook)
- To review and improve current products and services
- To comply with legal and regulatory obligations, requirements and guidance

5. What are the legal grounds for our processing of your personal information?

We rely on the following legal processes to use your personal data:

- **Where it is needed to provide you with our products or services, such as:**
 - a) Assessing an application for a product or service you hold with us, including consider whether or not to offer you the product, the price, the payment methods available and the conditions to attach
 - b) Managing products and services you hold with us, or an application for one
 - c) Updating your records, using your whereabouts to contact you about your account and doing this for recovering debt (where appropriate)
 - d) All stages and activities relevant to managing the product or service including enquiry, application, administration and management of accounts
- **Where it is in our legitimate interests to do so, such as:**
 - a) Managing your products and services relating to that, updating your records, using your whereabouts to contact you about your account and doing this for recovering debt (where appropriate)
 - b) To follow guidance and recommended best practice of government and regulatory bodies
 - c) For management and audit of our business operations including accounting

d) To carry out monitoring and to keep records of our communications with you and our staff (see below)

e) For direct marketing communications and related profiling to help us to offer you relevant products and services, including deciding whether or not to offer you certain products and service. We'll send marketing to you by email, phone, and post. Some Fitness Centres may also use SMS, social media and digital channels (for example using Facebook)

f) Subject to the appropriate controls, to provide insight and analysis of our customers to business partners either as part of providing products or services, helping us improve products or services, or to assess or to improve the operating of our businesses

- **To comply with our legal obligations**

- **With your consent or explicit consent:**

- a) For some direct marketing communications

- b) For some of our profiling and other automated decision making

- c) For some of our processing of special categories of personal data such as about your health, if you are a vulnerable customer

- **For a public interest, such as:**

- a) Processing of your special categories of personal data such as about your health, or if you are a vulnerable customer

- **When do we share your personal information with other organisations?**

We do not share information with any third parties

- **How and when can you withdraw your consent?**

Where we're relying upon your consent to process personal data, you can withdraw this at any time by contacting us using the details below.

- **Is your personal information transferred outside the UK or the EEA?**

We're based in the UK and your personal information is never transferred

- **What should you do if your personal information changes?**

You should tell us so that we can update our records. Please contact the manager of the club of which you are a member.

- **Do you have to provide your personal information to us?**

We're unable to provide you with our products or services if you do not provide certain information to us. In cases where providing some personal information is optional, we'll make this clear.

- **Do we do any monitoring involving processing of your personal information?**

In this section monitoring means any: listening to, recording of, viewing of, intercepting of, or taking and keeping records (as the case may be) of calls, email, text messages, social media messages, in person (face to face) meetings and other communications. We may monitor where permitted by law and we'll do this where the law requires it, or to comply with regulatory rules, for quality control and staff training purposes.

- **For how long is your personal information retained by us?**

Unless we explain otherwise to you, we'll hold your personal information based on the following criteria:

- a) For as long as we have reasonable business needs, such as managing our relationship with you while a member of one of our gyms, and managing our operations

- b) For as long as we provide goods and/or services to you and then for as long as someone could bring a claim against us; and/or
- c) Retention periods in line with legal and regulatory requirements or guidance.
- **What are your rights under data protection laws?**

Here is a list of the rights that all individuals have under data protection laws. They don't apply in all circumstances. If you wish to use any of them, we'll explain at that time if they are engaged or not. The right of data portability is only relevant from May 2018.

 - a) The right to be informed about the processing of your personal information
 - b) The right to have your personal information corrected if it is inaccurate and to have incomplete personal information completed
 - c) The right to object to processing of your personal information
 - d) The right to restrict processing of your personal information
 - e) The right to have your personal information erased (the "right to be forgotten")
 - f) The right to request access to your personal information and to obtain information about how we process it
 - g) The right to move, copy or transfer your personal information ("data portability")
 - h) You have the right to complain to the Information Commissioner's Office which enforces data protection laws: <https://ico.org.uk/>. You can contact us using the details below.
- **Your right to object**

You have the right to object to certain purposes for processing, in particular to data processed for direct marketing purposes and to data processed for certain reasons based on our legitimate interests.
- **What are your marketing preferences and what do they mean?**

We may use your home address, phone numbers, email address and social media or digital channels (for example, Facebook) to contact you according to your marketing preferences. You can stop our marketing at any time by contacting us or by following the instructions in the communication, or by contacting the manager of the club of which you are a member.