**Data Protection and SportsDock Customer’s Data – Fair Processing Notice**

**Summary**

* The Data Protection Act (1998) is being updated to reflect changes in technology and, how your personal data is collected, used and shared. In the UK, the new law will be called the Data Protection Act 2018 and will be based on the General Data Protection Regulation (GDPR).
* For the purpose of this law, UEL will be the Data Controller and will make decisions about how we use any personal data we collect from you.
* SportsDock will collect and use data relating to personal details, financial details, and services provided. In addition, we will collect and use special category data about you. Specifically, we will collect information about medical conditions to ensure that any advice we give you or equipment use is right for you.
* The principle purpose for processing your personal data is for us to manage your membership and communicate with you about your membership. To do this, you agree to a contract between SportsDock and you.
* Other purposes for which we process your personal data include:
	+ To meet our statutory or legal obligations including those relating to Health and Safety;
	+ To offer additional support
	+ With your consent; or
	+ Where such use would meet our legitimate interests and those interests do not outweigh your rights and freedoms.
	+ You have rights associated with how your personal data is used and managed. These rights include:
	+ To be informed what personal data about you SportsDock holds and what it is used for;
	+ To access your personal data;
	+ To update the personal data SportsDock holds about you;
	+ To be informed how SportsDock is complying with its obligations under the Act;
	+ To complain to the Data Protection Officer or Information Commissioner [(ico.org.uk)](file:///C%3A%5CUsers%5Cjmcmahon%5CAppData%5CLocal%5CMicrosoft%5CWindows%5CTemporary%20Internet%20Files%5CContent.Outlook%5CE3I0LD17%5Cico.org.uk)
	+ To have personal data erased where there is no compelling reason for us to keep the data.

**For information on how to exercise your information rights, please visit uel.ac.uk**

The Data Protection Act 2018 (The Act), regulates the processing of personal data of Data Subjects (‘you’} in any format by SportsDock including digital and hard copy personal data. Personal data is any information relating to a living individual, and processing is any activity carried out involving personal data, including collecting, holding, viewing and storing it.

This Fair Processing Notice is designed to give you information about what personal data we collect, what we do with your data, why we do it, and your rights in relation to its use.

UEL is the Data Controller for all personal data that it holds and processes about you. Our contact details are:

University of East London

University Way

London E16 2RD

United Kingdom

The Data Protection Officer works independently with UEL and Sportsdock to ensure that we protect your personal data. They can be contacted on dpo@uel.ac.uk or, via the data protection pages of uel.ac.uk.

During the course of our activities, SportsDock will collect, store and process personal information about our members, prospects and casual users.

While most of this data is collected from you directly, we could also collect your personal data:

* + By observation e.g. through your use of our equipment, technology, or connected devices;
	+ By deriving your personal data from combining other data sets

We treat all personal data in line with the data protection principles. No personal data held by us will be processed unless the requirements for fair and lawful processing are met.

**Types of Personal Data Processed**

In order to carry out our activities and obligations we process data in relation to:

* Your contact details and other information submitted, either during enquiry or the membership application stage
* Financial and personal data collected for the purposes of administering memberships
* Photographs, and video recordings for the purpose of promotion that is in our legitimate interest but still fair to you;
* Information about your engagement with SportsDock, such as access, bookings and class attendance
* Contact details for next of kin which will only be used in an emergency;
* Information related to the prevention and detection of crime and the safety and security of SportsDock’s customers and UEL’s staff and students, including, but not limited to, CCTV recording and data relating to breaches of SportsDock and UEL’s regulations;
* Information gathered for the purposes of equal opportunities monitoring;
* For educational members, copies of student cards or proof of study
* For corporate members, copies of staff cards

We also obtain, hold and process, special category personal data (the term used by the GDPR) or other sensitive data. Special category data held by SportsDock includes:

• Data about your Health, including any health conditions and/or any disabilities

Emergency contact details provided by you will be used to protect your vital interests and wellbeing and will only be used for this purpose. You should notify the relevant person that you are providing their contact details to SportsDock as your listed emergency contact.

**Primary purposes for processing**

Your personal data is used for the following purposes:

* The administration of your membership and bookings
* Financial administration including the payment of bookings, sessions and membership fees
* Security and crime prevention including the use of regulated CCTV;
* Provision of your membership card and its use in facilitating access;
* Administration of complaints, suggestions and comments
* To produce statistics and management information to enable SportsDock to understand its business and for strategic and management decision making.

This is not an exhaustive list, but is intended to communicate an overview of our purposes.

**Lawful Basis**

All processing of personal or special category data requires us to have a lawful basis for doing so. For some elements of processing, including for administration of memberships or your acceptance of our terms and conditions we process your personal data for the fulfilment of a contract between SportsDock and you. However, in some cases, we will rely on processing using another lawful basis such as:

* Under a legal obligation for example, disclosing personal data to external parties under statutory powers;
* Where it is necessary to protect your vital interests such as providing emergency medical care;
* Where it is necessary for the performance of a task carried out in the public interest or in the exercise of official authority;
* Where it is necessary for legitimate interests pursued by SportsDock or a third party (the legitimate interests will relate to the efficient, lawful and proportionate delivery of services and will not be to the detriment of your rights and freedoms);
* Where any of these lawful basis do not apply, we will seek your consent or explicit consent to process your personal data. In this case, you have the right to withdraw consent at any time with no detriment to you.

Where we process special category data, we are required to rely on a separate lawful basis specifically for that personal data. The lawful basis we choose will be dependent on the circumstances associated with that processing but in many cases the processing will take place on one of more of these basis:

* With your explicit consent;
* In the interests of public or occupational health;

**CCTV**

SportsDock and UEL operates a CCTV system around its sites, the purpose of which is to create a safer environment for students, staff and visitors to both SportsDock and the University. Due to the nature of such a system it is likely to capture your personal data.

CCTV is limited to public areas, e.g. reception areas, stairwells, lifts, outside areas as well as in the arenas, fitness centre, strength and conditioning room and the MUGA.

**University Monitoring**

In certain circumstances, particularly those that involve the prevention or detection of crime, fraud or misuse, SportsDock and UEL will monitor usage of its spaces. We reserve the right to access user information on our systems, networks and CCTV. Any institutional monitoring or access will comply with UK legislation including the Regulation of Investigatory Powers Act 2000, Human Rights Act 1998, and the Data Protection Act 2018. Where necessary, any access or monitoring will be justifiable, fair and proportionate, and will be in line with our institutional policies. Further information can be found in UEL’s Monitoring policy.

**Sharing your information**

SportsDock’s customers’ data may be shared with other companies who act as our data processor. Customer’s data will only be processed for the purpose it is intended and all companies acting as a data processor take appropriate technical and organisational measures against unauthorised or unlawful processing of customers’ data. Data may also be shared if there is a legal obligation to share data.

**Cookies and Analytics**

If you visit www.sportsdock.co.uk, we will send your computer a “cookie”, a small text file that resides on your computer’s hard drive. Cookies identify a user’s computer to our server but in no way gives the University access to your computer or any information about you, other than the data you choose to share. The SportsDock website uses cookies for collecting user information and allows us to make the website more useful by tailoring the services we offer from time to time. You can set your browser not to accept cookies, although you may not be able to access all of the features if you do.

The website also uses Google Analytics, a web analytics service provided by Google, Inc. Google Analytics sets a cookie in order to evaluate your visit to our website and compile reports and to help us improve the site.

Google stores the information collected by the cookie on servers in the United States. Google may also transfer this information to third parties where required to do so by law, or where such third parties process the information on Google's behalf. Google will not associate your IP address with any other data held by Google. By using the SportsDock website, you consent to the processing of data about you by Google in the manner and for the purposes set out above. See Google’s Privacy Policy for more information.

**Individual Rights**

You have rights associated with how we, or any organisation, use your personal data. These rights are:

* The right to request access to your personal data;
* The right to have inaccurate or incomplete personal data rectified;
* The right to erasure of personal data – this will only apply where there is no legitimate reason for SportsDock to continue to process the personal data;
* The right to restrict the processing of personal data – you have the right to block the processing of your personal data by us in some cases;
* The right to data portability - you have the right to have the personal data you have provided to us transferred to another organisation;
* The right to object – you can object to the processing of your personal data by SportsDock in certain circumstances, including the sending and receipt of direct marketing material and;
* The right to object to automated decision making and profiling - you have the right to object to decisions taken by automatic means without human intervention in some circumstances.

These rights are not absolute in every circumstance and a number of factors such as exemptions in law apply. Visit uel.ac.uk for more details. All requests to exercise any of these rights should be made to the Data Protection Officer at [dpo@uel.ac.uk](file:///%5C%5CDL-STAFF1%5CUSERS%5CD70%5Ccraig3%5CDESKTOP%5Cdpo%40uel.ac.uk).

Where the processing of your personal data or sensitive personal data/special category data is based only on your consent, you have the right to withdraw their consent at any time by contacting SportsDock or UEL’s Data Protection Officer. Examples of where we can only rely on your consent include direct marketing and promotions, or research.

If you are unhappy with our handling of your personal data, or believe that the requirements of the Act (or any legislation arising directly from it) may not be fully complied with, please contact SportsDock or UEL’s Data Protection Officer in the first instance. The formal complaint procedure will be used if appropriate, and you have right to submit a complaint to the Information Commissioner’s Office. Further details can be found at [ico.org.uk](file:///C%3A%5CUsers%5Ctpratt%5CAppData%5CLocal%5CMicrosoft%5CWindows%5CTemporary%20Internet%20Files%5CContent.Outlook%5COWTEMULX%5Cico.org.uk)

**Records Retention**

Your personal data will be disposed of when:

• We have met our legal retention requirements for your personal data or;

• We no longer have a legitimate reason to maintain that data and it is considered not to contain information, which has archival value to SportsDock.

If you have any specific queries, please contact dpo@uel.ac.uk.