

DATA PROTECTION & PRIVACY NOTICE 2019



Scope

This document refers to personal data, which is defined as information concerning any living person (a natural person who hereafter will be called the Data Subject) that is not already in the public domain.

The General Data Protection Regulation (GDPR) which is EU wide and far more extensive than its predecessor the Data Protection Act, along with the Privacy and Electronic Communications Regulations (PECR), seek to protect and enhance the rights of EU data subjects. These rights cover the safeguarding of personal data, protection against the unlawful processing of personal data and the unrestricted movement of personal data within the EU and its storage within the EEA.

7R Performance Ltd trading as 7R Gym/7R The Training Club is committed to protecting your privacy. This Privacy Notice explains our data processing practices and your options regarding the ways in which your data is used. If you have any requests concerning your personal information or any queries with regards to our processing please contact us at hello@7r-gym.com.

1 – The Company, 7R Performance Ltd, based at **Unit 6-8, Gunnery Terrace, Woolwich, SE18 6SW**, which hereafter for the purposes of this Privacy Notice will be referred to as the company, is pleased to provide the following information:

2 - Who we are

The company offers gymnasium services in the form of an open gym and CrossFit gym, where class instruction and personal training are available.

3 - Personal Data

- a) For the purposes of safety, the company may require detailed medical information as well as personal contact details and contact preferences. We will only collect what is relevant and necessary for your safety and to keep you informed. This data is always held securely, is not shared with anyone, although for data storage purposes it may be handled by pre-vetted staff who have all signed an integrity and confidentiality agreement. Contact details provided by you such as telephone numbers, email addresses, postal addresses may be used to remind you of future notices and provide reports or other information concerning your membership or the gym.
- b) For marketing purposes, the company may also use the contact details provided by you to respond to your enquiries, including making telephone contact and emailing information to you which the practice believes may be of interest to you.
- c) In making initial contact with the company you consent to the company maintaining a marketing dialogue with you until you either opt out (which you can do at any time) or we decide to desist in promoting our services. The company may occasionally also act on behalf of its members in the capacity of data processor, when we may promote other services based at our premises, who may not be employed by us. Contracted staff do not broker your data and you can ask to be removed from our marketing database by emailing or phoning the company using the contact details provided at the end of this Privacy Notice.
- d) Some basic personal data may be collected about you from the marketing forms and surveys you complete, from records of our correspondence and phone calls and details of your visits to our website, including but not limited to, personally identifying information like Internet Protocol (IP) addresses.
- e) Our company website uses cookies, which is a string of information that a website stores on a visitor's computer, and that the visitor's browser provides to the website each time the visitor returns. www.7r-gym.com and other relevant aliases attached to this domain, use cookies to help the company to identify and track visitors and their website access preferences. Visitors of the website who do not wish to have cookies placed on their computers should set their browsers to refuse cookies before using any website which is part of the 7R-gym.com domain.
- f) The company will only collect the information needed so that we can provide you with the services you require, the business does not sell or broker your data.

4 – Consent

By taking out a membership, filling in a contact form on our website www.7r-gym.com or using a mobile app we provide to you, you agree and accept that we may gather, process, store and/or use the personal data submitted in accordance with the terms set below. If you are under the age of 16, 7R Gym/7R The Training Club will not collect or process your details unless we have also received the consent of an adult who has parental responsibility for you.

5 – Disclosure

The company will keep your personal information safe and secure, only our pre-vetted staff will have access to your records, and will have access to your contact details so that they can manage your account. The company will not disclose your Personal Information unless compelled to, in order to meet legal obligations, regulations or valid governmental requests. The company may also enforce its Terms and Conditions, including investigating potential violations of its Terms and Conditions to detect, prevent or mitigate fraud or security or technical issues; or to protect against imminent harm to the rights, property or safety of its staff.

6 - Retention Policy

As a prospective member that has consented for us to contact you, 7R Gym/7R The Training Club will retain your data for up to 12 months, unless you notify us that you no longer wish to be contacted. If you join us, 7R Gym/7R The Training Club will retain your data for as long as you are a member. On termination of your membership, your personal data will be stored for a maximum period of 6 years for the purposes of responding

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to you in the event of any future indemnity claim that may arise. After this period, your personal data will be anonymized so you can no longer be identified from the information we hold.

7 - Data storage

We may store your personal data via your login (where appropriate) on ClubWise, EZ Facility, Wodify, Mailchimp, iZettle, Fitbot and Cliniko, all of which are GDPR compliant.

7.1 Your rights as a data subject

At any point while we are in possession of or processing your personal data, you, the data subject, have the following rights:

- a) Right to be informed – you have the right to know how your personal data is being used
- b) Right of access – you have the right to request a copy of the information that we hold about you.
- c) Right of rectification – you have a right to correct data that we hold about you that is inaccurate or incomplete.
- d) Right to be forgotten – in certain circumstances you can ask for the data we hold about you to be erased from our records.
- e) Right to restriction of processing – if you believe the basis for processing your data as described in section 3 of this notice no longer applies or if you contest the accuracy of the information we hold about you, you have a right to request restrictions to the processing of your data.
- f) Right of portability – you have the right to have the data we hold about you transferred to another organisation.
- g) Right to object – you have the right to object to certain types of processing such as direct marketing.
- h) Right to object to automated processing, including profiling – you also have the right to not be subject to the legal effects of any automated processing or profiling.

Note that if 7R Gym/7R The Training Club refuses a request from you under rights of access, we will provide you with a reason as to why.

Finally, if a data breach occurs which compromises your personal data, you have a right to be informed within 72 hours of us first becoming aware of the breach.

7.2 Purposes of processing and legal basis

The principal purpose of collecting your personal data is to provide you with the services defined in your membership agreement. To this end, you agree and accept that we may use your personal data to:

- Contact you in respect of your membership
- Manage your club access
- Facilitate member rewards (if applicable)
- Resolve any problems you may have and improve our service to you
- Comply with our legal and regulatory obligations

We use the personal data submitted to us only in accordance with the applicable data protection legislation. Our employees and third-party providers are under an obligation to respect your data privacy.

7.3 Marketing

To promote services for members to aid their health and fitness goals, such as (but not limited to) seminars, workshops, clinical services and open events. As a trading name within 7R Performance Ltd Group, the 7R Performance Clinic staff, comprised of pre-vetted staff who have all signed an integrity and confidentiality agreement, may also contact members to notify them of services, offers and/or events available within the clinic that may interest them. If you consent, we may send you marketing information by e-mail or sms about products and services which we believe may be of interest to you. We will always provide the ability to review or change your preferences or unsubscribe from marketing information with immediate effect. You can also make your request via e-mail to hello@7r-gym.com.

7.4 Data we collect

When you take out a membership with us, the following personal data may be collected and processed in accordance with the purpose and legal basis described above and may include: name, address, contact details (including e-mail and mobile phone number), gender, date of birth, attendance history, marketing preferences and bank details for billing. Some data is collected automatically through using our web site (see section 3.7 below). Certain features of our mobile app may connect to your social networking sites to enable you to follow or be followed by other members of 7R Gym/7R The Training Club. As a result, 7R Gym/7R The Training Club may process information from your social networking profile, but only if you consent to allow your social networking site to make information available to the app. You understand that, by creating an account for the mobile app, 7R Gym/7R The Training Club will be able to identify you by your profile.

7.5 Obtaining or changing your details

7R Gym/7R The Training Club can confirm to you the details of any personal data we hold about you and how it is processed on your request. You may also ask us to correct or delete personal information we hold about you at any time, so long as this information is not required in order to fulfil our service to you. For more information, request your details or advise us of any changes, please either:

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- Send an email to hello@7r-gym.com or;
- Write to us at: 7R Gym, Unit 6-8 Gunnery Terrace, Woolwich, London, SE18 6SW

We may require that your request be accompanied by a photocopy of proof of identity or authority, such as a driving license or passport. Mobile app users are able to maintain some of their personal data directly. Note that if your account is in arrears you will be unable to use this functionality and you will be directed to contact us accordingly.

7.6 Third party disclosures

Your information may be passed to and used by all 7R Gym/7R The Training Club companies. Your personal data is also passed to our data processor for the purpose of providing our services to you (see 3.1). Your data will not be shared with any other third-party service providers without obtaining your prior consent. Any third parties that we may share your data with are obliged to keep your details securely, and to use them only to fulfil the service they provide you on our behalf. When they no longer need your data to fulfil this service, they will dispose of your details in line with 7R Gym/7R The Training Club procedures.

We will never pass your personal information to anyone else, except where we are required or permitted to do so by law, for any successors in title to our business and suppliers that process information on our behalf both in the UK and abroad. We may also use and disclose information in aggregate (so that no individual customers are identified) for marketing and strategic development purposes.

7.7 Cookies

A cookie is a small amount of data, which often includes a unique identifier that is sent to your computer browser from a website's computer and is stored on your device's hard drive in the form of a text file.

7.7.1 How do 7R Gym/7R The Training Club use cookies?

Cookies are used to control an online session and provide security such as a time-out function. 7R Gym/7R The Training Club only issues session specific cookies which store no personal or transactional data.

7.7.2 Third Party Cookies: Google Analytics

7R Gym/7R The Training Club may use Google Analytics for SEO purposes and to improve their online marketing efforts. For a detailed explanation of how Google Analytics cookies work please visit: <https://developers.google.com/analytics/resources/concepts/gaConceptsCookies>

7.8 Other web sites

Our web site may contain links to other web sites which are outside our control and are not covered by this Privacy Notice. If you access other sites using the links provided, the operators of these sites may collect information from you which will be used by them in accordance with their privacy notice, which may differ from ours.

For Open Gym members, your identity and contact details of the data processor Personal data collected by us and stored via our website or mobile app is processed on our behalf by ClubWise Software Ltd, 6 Tower Court, Horns Lane, Princes Risborough, Bucks, HP27 0AJ Company Reg: 3843268. Your data is stored in the UK. From time to time it may be made visible to employees of ClubWise Development India Pvt. Ltd, Office No. 101, First Floor, Fourtune Arcade, Yeolekar Mala, College Road, Nashik – 422005, Maharashtra for the purposes of software support. 2 The data processor and its group are required by us to process your data in strict compliance with the GDPR.

8 - You can request the following information:

- Identity and the contact details of the person or organisation (the company) that has determined how and why to process your data.
- Contact details of the data protection officer, where applicable.
- The purpose of the processing as well as the legal basis for processing.
- If the processing is based on the legitimate interests of the clinic and information about these interests.
- The categories of personal data collected, stored and processed.
- Recipient(s) or categories of recipients that the data is/will be disclosed to.
- How long the data will be stored.
- Details of your rights to correct, erasure, restrict or object to such processing.
- Information about your right to withdraw consent at any time.
- How to lodge a complaint with the supervisory authority (ICO).
- Whether the provision of personal data is a statutory or contractual requirement, or a requirement necessary to enter into a contract, as well as whether you are obliged to provide the personal data and the possible consequences of failing to provide such data.
- The source of personal data if it wasn't collected directly from you.
- Any details and information of automated decision making, such as profiling, and any meaningful information about the logic involved, as well as the significance and expected consequences of such processing.

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9 - To access what personal data is held, identification will be required

7R Performance will accept the following forms of identification (ID) when information on your personal data is requested: a copy of your driving licence, passport, birth certificate and a utility bill not older than three months. A minimum of one piece of photographic ID listed above and a supporting document is required. If the company is dissatisfied with the quality, further information may be sought before personal data can be released. All requests should be made to dpo.7rgym@gmail.com or by phoning +44 (0) 208 317 6653 or writing to us at the address further below.

10 - The Right to Complain

If you believe that your data is being processed unfairly or you have any other concerns about the way that 7R Gym/7R The Training Club or its designated processor is handling your data, you have the right to complain to the Information Commissioners Office (ICO) if 7R Gym/7R The Training Club has not responded to your enquiry within 30 working days. Please visit www.ico.org.uk for more information.

11 - Privacy Notice Changes

7R Gym/7R The Training Club reserves the right to update this Privacy Notice at any time, in particular pursuant to any changes made to the laws and regulations in force. We would recommend that you check these rules from time to time to stay informed of our procedures and rules relating to your personal information.

12 - Contact Us

If you have questions relating to this privacy notice, you can:

- Send an email to hello@7r-gym.com or dpo.7rgym@gmail.com;
- Write to us at: 7R Gym, Unit 6-8 Gunnery Terrace, Woolwich, London, SE18 6SW
- ICO - Wycliffe House, Water Lane, Wilmslow, SK9 5AF Telephone +44 (0) 303 123 1113 or email: <https://ico.org.uk/global/contact-us/email/>