

# Privacy Policy and Procedure

We are committed to full compliance with the requirements of the General Data Protection Regulation (GDPR), (EU) 2018 and Data Protection Act, 1998. We will therefore follow procedures which aim to ensure that those who have access to any personal data or personal sensitive data held by or on our behalf are fully aware of and abide by their duties under the GDPR.

Cademon Sport and Fitness Limited is fully committed to full compliance with the requirements of the General Data Protection Regulation. We will therefore follow procedures which aim to ensure that all employees, contractors, partners or other servants or agents of Cademon Sport and Fitness Limited (collectively known as data users) who have access to any personal data held by or on behalf of us are fully aware of and abide by their duties under the General Data Protection Regulation

## **Statement of Policy**

Cademon Sport and Fitness Limited needs to collect and use information about people with whom it works in order to operate and carry out its functions. These may include current, past and prospective employees, clients and customers and suppliers. This personal information must be handled and dealt with properly however it is collected, recorded and used and whether it is on paper, in computer records or recorded by other means.

Cademon Sport and Fitness Limited regards the lawful and appropriate treatment of personal information as very important to its successful operations and essential to maintaining confidence between us and those with whom we provide our services to. We therefore, fully endorse and adhere to the Principles of the General Data Protection Regulation.

## Handling personal/special category data

Cademon Sport and Fitness Limited will, through management and use of appropriate controls, monitoring and review:

- Use personal data in the most efficient and effective way to deliver better services
- Strive to collect and process only the data or information which is needed
- Use personal data for such purposes as are described at the point of collection, or for purposes which are legally permitted
- Strive to ensure information is accurate
- Not keep information for longer than is necessary
- Securely destroy data which is no longer needed
- Take appropriate technical and organisational security measures to safeguard information (including unauthorised or unlawful processing and accidental loss or damage of data)
- Ensure that information is not transferred abroad without suitable safeguards
- Ensure that there is general information made available to the public of their rights to access information
- Ensure that the rights of people about whom information is held can be fully exercised under the General Data Protection Regulation

These rights include:

- The right to be informed
- The right of access to personal information

- The right to request rectification
- The right to request erasure
- The right to restrict processing in certain circumstances
- The right to data portability
- The right to object to processing
- The right to erase your details
- The right to erasure is not absolute and only applies in certain circumstances.
- The right to erasure does not apply if processing is necessary for one of the following reasons:
  - to exercise the right of freedom of expression and information;
  - to comply with a legal obligation;
  - for the performance of a task carried out in the public interest or in the exercise of official authority;
  - for archiving purposes in the public interest, scientific research historical research or statistical purposes where erasure is likely to render impossible or seriously impair the achievement of that processing; or
  - for the establishment, exercise or defence of legal claims.

## The Principles of Data Protection

Anyone processing personal data must comply with 6 principles of good practice. These principles are legally enforceable.

Summarised, the principles require that personal data shall be:

1. Processed lawfully, fairly and in a transparent manner in relation to individuals
2. Collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be considered to be incompatible with the initial purposes;
3. Adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
4. Accurate and where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay;
5. Kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes subject to implementation of the appropriate technical and organisational measures required by the GDPR in order to safeguard the rights and freedoms of individuals;
6. Processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures. Accordance with the rights of data subjects under the Act

The Act provides conditions for the processing of any personal data. It also makes a distinction between personal data and 'special category' data.

Personal data is defined as any information relating to an identified or identifiable natural person

Special category data is defined as personal data consisting of information as to:

- Racial or ethnic origin

- Political opinion
- Religious/philosophical beliefs
- Trade union membership
- Physical or mental health or condition
- Sexual life or sexual orientation
- Biometric data

### **Legal Basis for Processing**

Our legal basis for processing personal data is that of **legitimate interest**. Whenever you give us personal data, you are consenting to its collection and use in accordance with this privacy policy.

### **How do We Collect Information from You?**

We obtain information about you when you request information on our training and products, apply and book for training or if you register to receive information or our newsletters.

### **The Information We Collect**

The personal information we collect might include the following:

- facts and opinion about an individual where the data identifies an individual, for example: a register of attendance and assessment results
- first/last names
- email addresses
- photos/videos
- online identifiers (IP addresses)
- order details
- personal health status information (e.g. use of PARq forms for health, safety and wellbeing)

### **How Will We Use the Information You Give?**

The personal information we collect is used:

- to provide you with goods and services
- for learner and customer administration
- direct marketing communication
- to personalise our service to you
- to seek your views on products

## Direct Marketing Communications

From time to time we would like to contact you with details of our products and services. **We will only send you communications if you consent to us doing so.** We will treat your personal details with the utmost care and will not sell them to other companies for marketing purposes.

## Managing and Updating Your Data, Erasure and Asking a Copy of Your Records

We will manage and monitor the use of personal data in the following ways:

- Aim to collect and process only the information needed
- Aim to ensure information is accurate
- Use data for purposes as are described at the point of collection
- Not keep information longer than is necessary
- Securely destroy data which is no longer needed
- Aim to use appropriate technical and organisational security measures to safeguard information
- Ensure that the rights of people whose information is held is exercise under the GDPR, to include:
  - the right to be informed
  - the right of access to personal information
  - the right to request erasure\*
  - the right to request rectification
  - the right to data portability and processing
  - the right to lodge a complaint.

\* The right to erase your details applies only in certain circumstances and may not apply for the following reasons:

- to comply with a legal obligation
- to the right of freedom of expression and information.

Please contact [admin@thebamonline.co.uk](mailto:admin@thebamonline.co.uk) if you would like to:

- **update your details**
- **withdraw your consent or opt out of marketing communications**
- **request a copy of the data** we hold on you. We will aim to meet the request within 21 days but not more than 30 days
- **request erasure** of the data we hold on you.

## Cookies

Our website does not use cookies.

## Data Security

We are committed to ensuring the security and integrity of personal information we hold and have technical safeguards in place to ensure this. We would notify you if there is any breach of security.

With all electronic communication, the personal data you give us may be sent electronically to across the world and may be used, stored or processed anywhere in the world, including countries outside of the European Economic Area, who sit outside of the EU stringent data protection laws.

When we collect, process and use personal data, we will take steps to ensure that it is managed securely and in line with this privacy policy.

### **Disclosure**

We will not share your data to other third parties except:

- As required to meet your order or request for goods and services
- To partner suppliers that process data on our behalf
- In response to industry regulators as part of monitoring and quality assurance processes
- Where we believe, in good faith, that it is needed to comply with the law or protect the safety of staff, customers, participants or the public.