

Privacy Policy

1. Introduction

We are committed to safeguarding the privacy of our website visitors and centre users; this policy sets out how we collect and process your personal data. This includes any information you may provide through our website when you complete the 'Contact Us' form. By providing us with your data you confirm that you are over 13 years of age.

This policy is effective from 25 May 2018.

Contact Details

Our full contact details are:

Full name: **Lockswood Community and Sports Association**

Email address: centre@lockswood.org.uk

Address: **2 Centre Way, Locks Heath, Southampton SO31 6DX**

Telephone Number: **01489 582512**

2. What data do we collect about you?

Personal data means any information that can identify an individual.

We may process certain types of personal data about you as follows:

- **Identity Data** may include your first name, last name, title
- **Contact Data** may include your address, email address and telephone numbers.
- **Financial Data** may include your bank account and payment card details.
- **Transaction Data** may include details about payments between us and other details of purchases made by you.
- **Technical Data** may include your internet protocol addresses, browser type and version that you use to access this site.
- **Marketing and Communications Data** may include your preferences in receiving marketing communications from us and your communication preferences.

Sensitive Data

Sensitive data refers to any data that includes information about your:

- race or ethnicity,
- religious beliefs,
- political opinions,
- whether you are a member of a trade union,
- your physical, mental health or condition
- your sex life or sexual orientation

We may collect sensitive data about our employees only.

3. How we collect your personal data

We may collect data about you through a variety of different methods, including:

- **Website** – We collect data such as your IP address, geographical location, browser type, referral source, length of visit and number of page views. We collect this data by using **Cookies** (please see below) –

- **Direct contact or interactions** – You may provide information by filling out forms on our website, through our booking form, or communicating with us through post, phone, email or another form. This will include when you:
 - Hire our services
 - Request information to be sent to you
 - Give us feedback

4. Cookies

A cookie is a text file sent by a web server to a web browser and stored by the browser. The text file is then sent back to the server each time the browser requests a page from the server. This enables the web server to identify and track the web browser.

We may send a cookie which may be stored on your browser on your computer's hard drive. We may use the information we obtain from the cookie in the administration of this website, to improve the website's usability and for marketing purposes.

We may also use that information to recognise your computer when you visit our website, and to personalise our website for you. Most browsers allow you to refuse to accept cookies, however please note that this may affect the function and accessibility of our website.

5. Using your personal data

Personal data will only be used when legally permitted.

Data submitted via our website or other means will be used for:

- Performing the contract between us, and
- To comply with a legal or regulatory requirement.

In addition, we may use your data to:

- improve your browsing experience by personalising the website;
 - provide other companies with statistical information about our users e.g. Fareham Borough Council - but this information will not be used to identify any individual user.
- You have the right to withdraw your consent to marketing information at any time by emailing us at centre@lockswood.org.uk

6. Purposes of processing your personal data

Below is a description of the ways we intend to use your personal data.

Reason	Type of Data	Lawful basis for processing
To register you as a new centre user	Identity and contact data	To fulfil our contract with you
To process and deliver your service use: Manage payments, fees and charges	Identity, contact, financial, transaction, and marketing and communications data	To fulfil our contract with you and to recover debts owed to us

Collect and recover money owed to us		
To manage our relationship with you which will include: Notifying you about changes to our terms and conditions, or privacy policy	Identity, contact, and marketing and communications data	To fulfil our contract with you, to comply with necessary legal obligations, and to study how customers use and perceive our products/services
To administer and protect our business and our website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	Identity, contact, and technical data	To comply with legal obligation, and necessary for running our business
To establish, exercise or defend our legal rights (including providing information to others for the purposes of fraud prevention and reducing credit risk)	Identity, contact, and technical data	To comply with legal obligation, and necessary for running our business

7. Disclosures of your personal data

We may need to disclose your personal data with third parties for the reasons stated within section 5 of this policy.

These parties may be:

- Fareham Borough Council
- Professional advisers including lawyers, bankers, auditors and insurers who provide consultancy, banking, legal, insurance and accounting services.
- Service providers who provide IT and system administration services.
- HM Revenue & Customs, regulators and other authorities based in the United Kingdom and other relevant jurisdictions who require reporting of processing activities in certain circumstances.
- Social media outlets whom we use to deliver relevant content and advertisements to you.
- Cloud providers and email marketing platforms, such as DropBox, in order to manage our relationship with you.

We require all third parties to whom we transfer your data to respect the security of your personal data and to treat it in accordance with the law. We only allow such third parties to process your personal data for specified purposes and in accordance with our instructions.

8. Data Security

We have appropriate security measures in place to prevent your personal data from being lost, used or accessed in an unauthorised way. We limit the access our employees, agents, contractors and other third parties have to your data. They will only process it on our instructions and are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

9. Data Retention & Security

We will only keep your personal data for as long as necessary to fulfil the purposes for which we collected it. This also includes reasons that are relevant to legal, accounting, or reporting requirements.

By law we have to keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for six years after they cease being customers for tax purposes. These are stored securely within a locked cabinet, in a locked office, in the Lockwood Centre.

We review the data we hold about you and electronic communications for up to 6 months before deleting/destroying them. Booking forms will be kept for the duration of your time as a centre user and will be destroyed 6 months after you stop using our centre, or they expire.

All relevant documentation is either kept within a cabinet in a locked office, with restricted admittance or on centre computers which require authorised access. At any time you can ask us to delete your data.

In some circumstances, we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

10. Your Legal Rights

You may ask us to provide you with any personal information we hold about you. We will do this free of charge, however if your request is unfounded, repetitive or excessive we may charge a reasonable fee to cover administration costs. Your legal rights under the data protection laws can be viewed at the ICO website <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/>. If you would like to exercise any of your legal rights, please email us centre@lockwood.org.uk.

In order to confirm your identity we may need to obtain specific information from you. This is a security measure to make sure your personal data is not disclosed to any person who has no right to receive it.

We will try to respond to your request within 3 weeks, although there are occasions when this may take slightly longer. If this is the case, we will keep you updated.

11. Third-Party Links

Our website contains links to third party websites, plug-ins and applications. We are not responsible for the privacy policies of third party websites and do not have any control over them. For this reason, we encourage you to read the privacy policies for these other websites.

12. Policy Updates

We may update this privacy policy from time-to-time by posting an updated version on our website. You should check this page occasionally to ensure you are happy with any changes. We may also notify you of changes to our privacy policy by email or by letter.