

Privacy notice – Live Active & Vitality

Who will process your information?

The personal information you give to us through any of our forms relating to your participation in the Live Active programme and any other personal information we hold about you in this context will be processed by East Renfrewshire Culture and Leisure Ltd, St. John's, 18 Commercial Road, Barrhead, East Renfrewshire, G78 1AJ.

East Renfrewshire Culture and Leisure is a charitable trust set up by East Renfrewshire Council in 2015 to manage and deliver its culture and leisure services.

Why do we process your information?

Your information is processed to help us effectively manage your participation in the Live Active programme. It is also used to ensure you get any concessions that you are entitled to, and where you have opted in to receive marketing and promotional information we will contact you for this purpose. Your information may also be shared with other services within the Trust and other organisations for the same purposes and also to

- check the information we have is accurate;
- prevent and/or detect crime;
- assist us in retaining your membership;

Other organisations may include other councils, public sector agencies, government departments, regulatory and law enforcement bodies and other private companies or entities (such as contractors providing IT systems on which library services information is held)

What is the legal basis for us to process your information?

East Renfrewshire Culture and Leisure processes your information in order to fulfil its legitimate interests in this area. The stated vision of the Trust is *"Our vision is to help and inspire people to be actively involved in sport, arts and culture."*

A Legitimate Interest Test has been carried out and is available for inspection by contacting the Data Protection Officer. Contact details are in the relevant section below.

Do you have to provide your information?

Without the correct information we may be unable to effectively process your participation in the programme, process your payments, or contact you in the event of a cancellation or other operational reason. We would also be unable to effectively promote other cultural service events and activities should you opt-in.

How do we collect information about you?

We obtain personal information about people

- directly from you, for example when you fill out an application form
- from other people who are connected with you in connection with a service to be or being provided to them
- from people who are complaining regarding your actions and compliance with the law and

other public bodies such as other Councils, Police Scotland, Audit Scotland and regulators such as the Scottish Social Services Council or the General Teaching Council.

Such information includes:-

- Your name & contact details (including email and telephone numbers)
- Your age & date of birth
- Your photograph
- Your membership status (in order to assess relevant exemptions) eg concession
- Any health or medical information that instructors need to be aware of
- Your attendance and payment history
- Your ethnicity should you volunteer that information

You may update your personal information and preferences either in person or by accessing your account online.

How long will we keep your information?

We are aware that we must not keep personal information longer than is necessary for our purposes. Sometimes, law sets down these time limits. In that case, we must comply with those specified time limits.

However, in most cases this relates to where we have a business need to keep the personal information although it may not be actively using the information. This usually depends upon whether anyone has continuing interest in (such as auditors) or rights to take action of any sort against us in relation to the reason why we are using the information

On that basis the Trust will hold your information for a period of 2 years from the date of your referral. Your information on the system will be destroyed under confidential conditions after this period. Your initial paper membership form will be destroyed as soon as the information is used to create your electronic membership record.

Who is your information shared with?

Your information will be accessed by Trust staff who need to do so to effectively manage your participation in our fitness programmes.

Your information may also be shared with other services within the Trust, other services within East Renfrewshire Council, other councils, public sector agencies including the NHS, governmental departments and other private companies or entities (such as IT system service providers).

The Trust also generally complies with requests for specific information from other regulatory and law enforcement bodies where this is necessary and appropriate.

Do we transfer your information outside the UK?

In general we do not transfer personal information outside the UK but on the rare occasions we do we will inform you.

We will only transfer information outside the UK when we are satisfied that the party that will handle the data and the country it is being processed in have adequate safeguards for personal privacy comparable to those which are in place in the UK.

Profiling and automated decision-making

The Trust does not use profiling or automated decision-making for managing your gym and fitness subscription. Some processes are semi-automated but a human decision-maker will always be involved before any decision is reached in relation to you.

Your rights

You have the right to:

1. Be informed of the Trust's use of your information

This notice is intended to give you relevant information to meet this right.

2. Access personal data held about you
3. Request rectification of your personal data
4. Request that the council restricts processing of your personal data
5. Object to the processing of your data
6. Ask us to delete your information
7. Withdraw your consent if consent is the lawful basis for processing your data

Complaints

If you have an issue with the way the Trust handles your information or wish to exercise any of the above rights in respect of your information you can contact the Trust's data protection officer by post at:

The Data Protection Officer

East Renfrewshire Council

Council headquarters

Eastwood Park

Giffnock

G46 6UG

or by email at DPO@eastrenfrewshire.gov.uk

You have the right to complain directly to the Information Commissioner's office (ICO).

The address of their head office is: Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5EF

Telephone: 0303 123 1113

Alternatively, you can report a concern via their website at www.ico.org.uk

The ICO also have a regional office at 45 Melville Street, Edinburgh EH3 7HI

Telephone: 0303 123 1115 e-mail: scotland@ico.org.uk

While you can go directly to the ICO, the Trust would welcome an opportunity to address any issues you have in the first instance.