



Sentinel Leisure Trust

PRIVACY POLICY

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V1WORKING	27 th April 2018	Amendment for GDPR and DPO / Data Controller contact
V1LIVE	17 th May 2018	Live update – passed by SMT
V2LIVE	9 th July 2018	Updated to include main third parties

If you require this policy in an alternative format please email info@sentinellt.co.uk or telephone 01502 532541

CONTENTS

1. Introduction
2. Scope
3. Aims
4. Collecting and sharing Personal Information
5. Using Personal Information
6. Web User Tracking (use of cookies, IP Addresses and Aggregate Information)
7. Your rights as a Data Subject
8. Data Protection Principles
9. Consent
10. Collection and use of Employee Personal Information
11. Security
12. Monitoring and enforcement
13. Compliance
14. Data Protection (UK)
15. Information Processor Activities
16. Retention of Personal Data
17. Children's online Privacy Protection
18. Accessing and updating your Personal Information
19. Social Media and Online Engagement
20. Changes to this Privacy Policy
21. Contacting Sentinel Leisure Trust

PRIVACY POLICY

1. Introduction

This privacy policy sets out how Sentinel Leisure Trust uses and protects any information that you give Sentinel Leisure Trust when you use any Sentinel Leisure Trust service.

Sentinel Leisure Trust is committed to ensuring that your privacy is protected. Should we ask you to provide certain information by which you can be identified when using a Sentinel Leisure Trust service, you can be assured that it will only be used in accordance with this privacy statement.

Sentinel Leisure Trust may change this policy from time to time by updating the information on its Websites. You should check this page from time to time to ensure that you are happy with any changes. This policy is effective from **17th May 2018**.

2. Scope

Sentinel Leisure Trust was established in 2011 and operated under the trading name of Sentinel Leisure Trust and Sentinel Enterprises Limited. We are committed to safeguarding the privacy of our service users. In this policy we explain how we will treat your personal information.

All our processes and procedure regarding the collection and distribution of personal data have a key driver to demonstrate a commitment to protecting an individual's privacy. There are various ways that you might interact with Sentinel Leisure Trust, and the information you provide when doing so allows us to improve our services. By using this website and our related websites (collectively, the "Site") and by supplying your details to Sentinel Leisure Trust, you consent to Sentinel Leisure Trust collecting and processing your information.

3. Aims

The aims of this document are to explain:

- What information we collect, and why we collect it
- How we use that information
- The categories of personal data collected
- Your rights as a Data Subject
- Obtaining your Consent
- How we protect that information
- How you can control your information, including accessing, updating and deleting what we store
- How we share information collected
- Your rights to lodge a complaint

4. Collecting and sharing Personal Information

Sentinel Leisure Trust may collect or record basic personal information (e.g., name, e-mail address, mailing address, phone number) which you voluntarily provide through submitting forms via our Website, through electronic mail, or through other means of communication between you and Sentinel Leisure Trust.

Sentinel Leisure Trust only collects personal information of a more sensitive nature (e.g. bank account details or other ID numbers, credit card details and account numbers) where it is appropriate or necessary for conducting business. This information will be collected, stored, accessed and processed in a secure manner. Sentinel Leisure Trust may also collect general non-personal information pertaining to users of our sites, including IP addresses, source domain names, specific web pages, length of time spent, and pages accessed. This information is collected, among other things, to aggregate statistical information, facilitate system administration and improve the Site and services offered to you.

Sentinel Leisure Trust also collects, uses, and discloses identifiable information about individual contacts for Sentinel Leisure Trust's customers ("Business Contact Information") in the ordinary course of its business for managing and maintaining customer relationships. In particular, Sentinel Leisure Trust may obtain the following types of Business Contact Information: name, address, invoice information including bank account information, and order information. Unless otherwise specified or prohibited, Sentinel Leisure Trust may share information with affiliates, business partners, service providers, subsidiaries or contractors who are required to provide you with services which you have requested from us.

Sentinel Leisure Trust currently utilise software and services from the following external companies to deliver our main obligated services to our customers;

- **Exerp** (Clublead – Pulse Fitness) – Membership management
- **CoursePro** – Swimming Lesson management
- **VirtuaGym** – Member communications, programmes and wellbeing (member app)
- **Revitalize** - FREE community health & wellbeing platform
- **Graphitas** - Web Developers

The above companies are designated as Data Processors. Sentinel Leisure Trust remain the Data Controller of all personal data.

Sentinel Leisure Trust may also post links to third party websites as a service to you. These third party websites are operated by companies that are outside of our control, and your activities at those third party websites will be governed by the policies and practices of those third parties. We encourage you to review the privacy policies of these third parties before disclosing any information, as we are not responsible for the privacy policies of those websites.

5. Using Personal Information

Sentinel Leisure Trust uses the information we collect to provide you with services which you request and to improve our existing services and the content of our Site. When you contact Sentinel Leisure Trust, we may keep a record of your communication to help solve any issues that you might be facing. Your information may be retained for a reasonable time for use in future contact with you, or for future improvements to Sentinel Leisure Trust services. In the event the information you provide to us is an

application for employment, that application will be held in accordance with our Document Retention Policy. You have the option to opt-out or opt-in for further communications from Sentinel Leisure Trust.

Sentinel Leisure Trust may also use or disclose your personal information when Sentinel Leisure Trust believes, in good faith, that such use or disclosure is reasonably necessary to (i) comply with law, (ii) enforce or apply the terms of any of our user agreements, or (iii) protect the rights, property or safety of Sentinel Leisure Trust, Sentinel Leisure Trust's users, or others. Sentinel Leisure Trust reserves the right to transfer and disclose your information if Sentinel Leisure Trust becomes involved in a business divestiture, change of control, sale, merger, or acquisition of all or a part of its business.

6. Web User Tracking (use of Cookies, IP Addresses and Aggregate Information)

Cookies are a technology that can be used to help personalise your use of a website. A cookie is an element of information that a website can send to your browser, which may then store it on your system. You can set your browser to notify you when you receive a cookie, giving you the chance to decide whether to accept it or decline at any time. To enable Sentinel Leisure Trust to assess the effectiveness and usefulness of this Site, and to give you the best user experience, we collect and store information on pages viewed by you, your domain names and similar information. Our Site makes use of anonymous cookies for the purposes of:

- Completion and support of Site activity
- Site and system administration
- Research and development
- Anonymous user analysis, user profiling, and decision-making.

An Internet Protocol ("IP") address is associated with your computer's connection to the internet. Sentinel Leisure Trust may use your IP address to help diagnose problems with Sentinel Leisure Trust's server, to administer the Site and to maintain contact with you as you navigate through the Site. Your computer's IP address also may be used to provide you with information based upon your navigation through the Site.

Aggregate information is used to measure the visitors' interest in, and use of, various areas of the Site and the various programs that Sentinel Leisure Trust administers. Sentinel Leisure Trust will rely upon aggregate information, which is information that does not identify you, such as statistical and navigational information. With this aggregate information, Sentinel Leisure Trust may undertake statistical and other summary analyses of the visitors' behaviours and characteristics. Although Sentinel Leisure Trust may share this aggregate information with third parties, none of this information will allow anyone to identify you, or to determine anything else personal about you.

7. Your Rights as a Data Subject

The Data Subject is the person or persons Sentinel Leisure Trust hold any information on and for. As the Data Subject, you can be assured that:

- The Data Subject has the right to Access personal details upon request

- The Data Subject has the right to rectify any inaccuracies within their data
- The Data Subject has the right to have all their personal data erased (right to be forgotten)
- The Data Subject has the right to rectifying any processing of their personal data
- The Data Subject has the right to obtain a copy of their personal data in a commonly used format and have it transferred to another controller
- The Data Subject has the right to object to the processing of their personal data
- The Data Subject has the right to object to any automated decision making
- The Data Subject has the right to compensation for damages caused by infringements of the Regulation from the Data Controller or Data Processor

All requests by the Data Subject to petition any of the above Rights should be, in the first instance, raised with the Data Protection Officer, dpo@sltrust.co.uk .

8. Data Protection Principles

Under the GDPR Sentinel Leisure Trust is committed to ensuring that:

- personal data is processed lawfully, fairly and in a transparent manner
- personal data is collected for specific, explicit and legitimate purposes
- personal data shall be adequate, relevant and limited to what is necessary in relation to the purposes for which it is processed
- personal data is accurate and, where necessary, kept up to date and all inaccuracies having regard to the purposes for which it was collected are erased or rectified at the first opportunity
- personal data is kept no longer than is necessary for the purpose for which it was collected
- personal data is processed in a manner that ensures appropriate security and personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage using appropriate technical or organisational methods
- personal data is limited to what is necessary in relation to the purpose for which it was collected, adequate and relevant
- personal data is collected and processed in a legal manner in relation to consent, categories of personal data, contract and legal obligations, Legitimate, Vital and Public interests and process documentation.

9. Consent

Giving Consent to Sentinel Leisure Trust will only be undertaken where the individuals have:

- a genuine choice and level of control over how your data is used
- the right to ONLY opt-in to give consent with no pre-ticked or implied consent options
- individuals are made fully aware of what they are consenting to
- the right to withdraw consent at any time by speaking to a member of staff or emailing info@sentinellt.co.uk
- the right to know the purpose of collecting and processing your data

There is the need for Sentinel Leisure Trust to collect and process personal data without consent in the fulfilment of its duties and obligations to you, where appropriate. (For example: Personal and banking

information will be required to process direct debit payments for membership fee collections). Sentinel Leisure Trust currently partners **Pulse Fitness, VirtuaGym and CoursePro** to enable the collection of these payments and, as a business necessity, have access to customer's personal information.

Sentinel Leisure Trust will hold a copy of your consenting action in relation to who consented, when and how you were told. This information will be kept by Sentinel Leisure Trust as long as is deemed appropriate.

Special categories of data, defined by the GDPR as data which may be 'particularly sensitive in relation to fundamental rights and freedoms' and deserve specific protection, will only be requested for specific and documented reasons. Any special categories of Data requested will only follow an affirmative and explicit action by the customer to give consent for this data to be collected.

All third parties who partner Sentinel Leisure Trust will be verified as offering a good standard of data security for Sentinel Leisure Trust customer information, meeting the necessary requirements for GDPR before any partnership agreement is undertaken.

10. Collecting and use of Employee Personal Information

We also collect personal information from our employees and from job applicants (human resource data) in connection with administration of our human resources programs and functions. These programs and functions include, but are not limited to: job applications and hiring programs, compensation and benefit programs, performance, review and development processes, training, access to our facilities and computer networks, employee profiles, employee directories, human resource recordkeeping, and other employment related purposes. It is the policy of Sentinel Leisure Trust to keep all past and present employee information private from disclosure to third parties. There are certain business related exceptions and they are:

- To comply with local, regional, national contractual legislation requests
- Inquiries from third parties with a signed authorisation from the employee to release the information, except in situations where limited verbal verifications are acceptable (see below)
- Third parties with which Sentinel Leisure Trust has contractual agreements to assist in administration of company sponsored benefits

Prospective employers, government agencies, financial institutions, and residential property managers routinely contact Sentinel Leisure Trust requesting information on a former or current employee's work history and salary. All such requests of this type shall be referred to and completed on a confidential basis by the People Solutions team or payroll department. For written verification of employment requests, information will be provided on the form only when it is accompanied by an employee's signed authorisation to release information. The form will be returned directly to the requesting party and filed as part of the People Solutions or payroll department's confidential records.

11. Security

The security of your personal information is important to us. We follow generally accepted best practice industry standards to protect the personal information submitted to us, both during transmission and once we receive it.

Sentinel Leisure Trust uses all reasonable measures to safeguard personally identifiable information, which measures are appropriate to the type of information maintained, and follows applicable laws regarding safeguarding any such information under our control. In addition, in some areas of our Sites, Sentinel Leisure Trust may use encryption technology to enhance information privacy and help prevent loss, misuse, or alteration of the information under Sentinel Leisure Trust ' control. Sentinel Leisure Trust also employs industry-standard measures and processes for detecting and responding to inappropriate attempts to breach our systems.

No method of transmission over the Internet, or method of electronic storage, can be 100% secure. Therefore, Sentinel Leisure Trust cannot guarantee the absolute security of your information. The Internet by its nature is a public forum, and Sentinel Leisure Trust encourages you to use caution when disclosing information online. Often, you are in the best situation to protect yourself online. You are responsible for protecting your username and password from third party access, and for selecting passwords that are secure.

12. Monitoring and Enforcement

Sentinel Leisure Trust regularly reviews our compliance with our privacy policy. We also adhere to several self-regulatory frameworks in addition to complying with applicable law. If we receive formal written complaints, we will follow up with the person making the complaint. We work with the appropriate regulatory authorities to resolve any complaints that cannot be resolved directly.

13. Compliance

Sentinel Leisure Trust adheres to the European Union ("EU") Data Protection (95/46/EC) and e-Privacy (2002/58/ED) Directives, the Data Protection Act 1998 and the General Data Protection Regulations. Sentinel Leisure Trust does, for legitimate business reasons, transfer minimal data outside the EU and all/any company operating or storing information in the US will be required to comply to European Union ("EU") Data Protection (95/46/EC) and e-Privacy (2002/58/ED) Directives, the Data Protection Act 1998 and the General Data Protection Regulations or have signed up to the US Privacy Shield.

14. Data Protection (UK)

Sentinel Leisure Trust is registered as a Data Controller under the Data Protection Act: Certificate of Registration number **A8313090**.

15. Information Processor Activities

Sentinel Leisure Trust operates as an information Data Controller for our business customers located in the EU. Sentinel Leisure Trust's business customers remain the information controllers with respect to any EU Customer Information that they provide to Sentinel Leisure Trust for our provision of services. Sentinel Leisure Trust therefore acts in accordance with the instructions of such customers regarding the collection, processing, storage, deletion and transfer of EU Customer Information, as well as other matters such as the provision of access to and rectification of EU Customer Information.

Individuals may contact the Data Protection Officer identified below to review any personal information held about them. Sentinel Leisure Trust reserves the right to take reasonable steps to authenticate the

identity of any such individual seeking access to such personal information. Questions, comments, or access requests regarding EU Personal Information should be directed to the Data Protection Officer identified below.

16. Retention of Personal Data

Sentinel Leisure Trust will only continue to hold personal data for a reasonable time to a point where the data is no longer required or used. At such a point, some of the personal data may be retained for a longer period for eg: statistical and performance analysis, but other data eg: personal bank details will be deleted once a membership has been cancelled.

Retention periods also exist for data collected and processed for Financial & HR purposes, CCTV imagery, Insurance and Liabilities and to allow Sentinel Leisure Trust to undertake its services for customers, commissioners and stakeholders.

17. Children's Online Privacy Protection

Sentinel Leisure Trust routinely collects data on children in order to undertake the delivery of its services. This may include personal information including name, address, date of birth, school, etc. This information will only be used for the purpose for which it was collected. Eg: swimming lessons, Education Enrolment, Junior Fitness Memberships, and Holiday Club Activities.

Parental or Guardian consent is requested for all usage in, for example, climbing, holiday club and junior fitness memberships, for children and adolescents up to the age of 16.

18. Accessing and updating your Personal Information

If you have provided Sentinel Leisure Trust with your personal information, you have the right to inspect the information stored by us for accuracy, or may request that the information be removed from our records. Sentinel Leisure Trust will make all reasonable efforts to comply with such requests except where it would require a disproportionate effort (for example developing a new system or changing an existing practice). We may require that you verify your identity before we act on a request to edit or remove your information. Please direct any questions about your Personal Information to DPO@sltrust.co.uk.

19. Social Media and online engagement

We use a variety of new technologies and social media options to communicate and interact with customer, potential customers, employees and potential employees. These sites and applications include popular social networking and media sites, open source software communities and more. To better engage the public in ongoing dialog, certain Sentinel Leisure Trust businesses use certain third-party platforms including, but not limited to, Facebook, Twitter, Instagram, Youtube and LinkedIn.

Third-Party Websites and Applications (TPWA) are Web-based technologies that are not exclusively operated or controlled by Sentinel Leisure Trust. When interacting with the Sentinel Leisure Trust presence on those websites, you may reveal certain personal information to Sentinel Leisure Trust or to

third parties. Other than when used by Sentinel Leisure Trust employees for the purpose of responding to a specific message or request, Sentinel Leisure Trust will not use, share, or retain your personal information.

- The Facebook privacy policy is available at: <http://www.facebook.com/policy.php>
- The Twitter privacy policy is available at: <http://twitter.com/privacy>
- The LinkedIn privacy policy is available at: http://www.linkedin.com/static?key=privacy_policy
- The Instagram privacy policy is available at: <https://help.instagram.com/155833707900388>
- The Youtube privacy policy is available at: <https://policies.google.com/privacy?hl=en-GB&gl=uk>

20. Changes to this Privacy Policy

Sentinel Leisure Trust may change this privacy policy from time to time. If this privacy policy changes, the revised privacy policy will be posted at the "Privacy Policy" link on the Site's home page. In the event that the change is significant or material, we will notify you of such a change by revising the link on the home page to read "Newly Revised Privacy Policy." Please check the privacy policy frequently. Your continued use of the Site constitutes acceptance of such changes in the privacy policy, except where further steps are required by applicable law.

21. Contacting Sentinel Leisure Trust

Questions regarding this privacy policy should be directed to DPO@sltrust.co.uk or call **01502 532541** and ask to speak to the Data Protection Officer.