Privacy Notice for Harrow Leisure Service

This Privacy Notice broadly explains what information we collect in order to deliver health and leisure services to you. The notice will explain the purpose for processing, categories of personal information and who we may share it with. It applies to all personal information collected for or on behalf of the Council whether by letter, email, face-to-face, telephone, online or any other method.

To understand how your own personal information is processed you may need to refer to any personal communications you have received, check any privacy notices the Council and or Sports and Leisure Management Ltd (Everyone Active) has provided or contact the department directly to ask about your personal circumstances.

Purpose for processing your information

For the delivery of leisure services at Harrow Leisure Centre, Hatch End Swimming Pool, and Bannister Sports Centre. In order to provide these services, and respond to customer feedback, it is necessary for the council to collect, store and process personal data relating to centre users and members.

We collect the following information:

Leisure Centre members and user details including all or some of the following data:

- Contact details Name, address, phone
- Financial details and your payment history
- Information about your age
- Your activity history at our sites

This information is only used for the intended purpose but if we intend to use it for any other purpose; we will normally ask you first. In some cases, the Council may use your information for another purpose if it has a legal duty to do so, to provide a complete service to you, to prevent and detect fraud, or if there is a risk of serious harm or threat to life.

How we collect your information

We collect information by email, letter, face-to-face, telephone, and by online forms.

Who the information is shared with

The information is shared with the Council's Leisure Contractor currently Sports and Leisure Management Ltd (Everyone Active). Everyone Active's Privacy Policy can be seen at https://www.everyoneactive.com/legal-policies/privacy/

The information may be shared with the Local Government Ombudsman in accordance with the Council's Corporate Complaints Policy.

We will sometimes need to share information between Council departments and services as well as other organisations such as our partners, third party contractors, government bodies, the police, health and social care organisations, housing associations, landlords and educational establishments.

We will only share information with these organisations where it is appropriate and legal to do so. We may also share information, for example, if there is a risk of serious harm or threat to life, for the prevention and detection of fraud or crime, assessment of any tax or duty or if we are required to do so by any court or law. Where this is necessary, we are required to comply with all aspects of the General Data Protection Regulation.

Page 1 of 2

How long do we keep your information?

Records are maintained on the leisure centre database while you are an active leisure centre member. We will not hold your information in relation to a response to service provision feedback for longer than is necessary.

Your rights and access to your information

You have the right to request a copy of the information that we hold about you.

The new General Data Protection Regulation also gives you additional rights about the information we hold about you and how we use it, including the right to:

- Withdraw consent and the right to object and restrict further processing of your data; however, this may affect service delivery to you.
- Request to have your data deleted where there is no compelling reason for its continued processing and provided that there are no legitimate grounds for retaining it.
- Request your data to be rectified if it is inaccurate or incomplete
- Have your data transferred or copied should you move to another authority
- Not be subject to automated decision-making including profiling

To submit a Subject Access Request visit our request page.

If you have any concerns

Please contact us if you would like to know more about the information we hold about you and how we use it:

dpo@harrow.gov.uk

You have a right to complain to us if you think we have not complied with our obligation for handling your personal information; please visit our <u>Compliments and Complaints</u> page.

If you are not satisfied with the Council's response you have a right to complain to the Information Commissioner's Office (ICO). You can <u>report a concern by visiting the ICO website</u>.

Changes in your circumstances

You must notify us immediately if there are any changes in your circumstances and personal details so we can maintain an accurate and up to date record of your information.