

## Gym Members Data Privacy Notice

This Privacy Notice explains how we, University College Birmingham (the “**University**”) of Summer Row, Birmingham, B3 1JB, telephone number: 0121 604 1000, use the personal data we collect. The University collects personal data from you when you join the University’s gym. We are the data controller for such personal data relating to you and this Privacy Notice explains how we will process your personal data.

Personal data is held on a University database. All of the information we hold is held securely and only authorised staff can access it. The information that we collect will be held in accordance with General Data Protection Regulation 2016/679 (the “**GDPR**”) and the Data Protection Act 2018.

The University’s Data Protection Officer is the Head of Information Services:

Ruth Cartwright

Address: University College Birmingham, Summer Row, Birmingham B3 1JB

Email: [dataprotection@ucb.ac.uk](mailto:dataprotection@ucb.ac.uk)

Telephone: 0121 604 1000

### **There are certain principles that the University must adhere to. This means that we will make sure your information:**

- Is treated fairly and is only used for the purposes for which we have collected it and for which we have a legal basis for processing.
- Will only be used for the purposes for which it was collected, unless we ask your permission to use it for something else.
- Will not be excessive. i.e. We will not hold information about you that we do not need.
- Will be accurate.
- Will not be kept longer than is necessary
- Will be kept securely so that there is no loss of data or data breaches. Personal data is kept on secure servers and any hard copies are kept in secure locations. Only authorised people have access to your personal information. [We will ensure that, where personal data is shared and stored outside of the European Union, there are appropriate safeguards in place to protect your personal data.]

### **You have certain rights as a data subject under the GDPR. This means that you have:**

- The right to gain access to your personal data – You can ask us what information we hold on you.
- The right to rectification – You can ask us to put right any information that you believe is incorrect or where appropriate, given the purposes for which your data is processed, the right to have incomplete data completed.

- The right to erasure – You can ask for information to be removed, although this is a limited right which applies, among other circumstances, when the data is no longer required or the processing has no legal justification. There are also exceptions to this right, such as when the processing is required by law or in the public interest.
- The right to restrict processing – If you feel you are being disadvantaged by us holding information that is inaccurate, you can ask us to stop processing it until we fix it, or come to an agreement.
- The right to data portability – You can ask us to extract your information so that you can use it elsewhere.
- The right to object – You can object to us processing your data for marketing purposes. You can also object to us processing your data when such processing is based on the public interest or other legitimate interests, unless we have compelling legitimate grounds to continue with the processing.
- Where the legal basis for processing your personal data is based on your consent, the right to withdraw your consent at any time.
- Rights in relation to automated decision making and profiling – However, the University will never make any decisions about you without any human intervention.

For any information on your rights, or if you have questions or concerns, please contact the Data Protection Officer.

You also have the right to complain to the Information Commissioner's Office (ICO) if you feel that University is not processing data correctly. You can make a complaint on the ICO's website: <https://ico.org.uk/> .

## **Why does the University need information about you and what is the purpose of our processing?**

We only process data for specified purposes and if it is justified in accordance with data-protection law. The University holds information on gym members for membership, security and health and safety purposes.

## **What Data do we hold?**

### **Biographical Information**

Name, Course, address, phone, email, ID number, amount paid, type of membership

### **Physical Activity Readiness Questionnaire**

This holds information that you have shared with us regarding your health to ensure you are fit and able to use the gym equipment.

Parental consent (if under 18)

## CCTV

CCTV is used within UCB for security reasons and your image may be recorded whilst you are attending the UCB premises.

### How long will we hold your data?

Information held on the Gym membership systems can be removed at your request after the expiry date of your membership.

Paper forms are archived and destroyed after 2 years.

CCTV data will be deleted after 31 days.

### Who might we share your information with?

On occasion we may need to share your data internally and with third parties. The following is a list of organisations with which we may share information. It is not an exhaustive list, but any organisation with which we share information will have confirmed their compliance with Data Protection Regulations.

- Our administrative staff associated with the University gym
- Software providers that the University use may need access to resolve IT issues.
- Medical Emergency Organisations
- Relevant authorities dealing with emergency situations at the University\*
- Any other authorised third party to whom the University has a legal/contractual obligation to share personal data with

\*Please note that in emergency situations where the University deems it to be in your (or potentially a third party's) 'vital interests' the University may share your personal data, including sensitive personal data with relevant individuals/agencies, e.g. the Police.

## Legal Basis

The legal basis under which UCB processes the above information is as follows:

Processing is necessary for the performance of a contract (See GDPR Article 6(1)(b)) or to take steps to enter into a contract and we will be unable to provide you with a gym membership if you do not provide your personal data.

Personal data relating to your health will only be held with your explicit consent to its processing (see GDPR Article 9(2)(a)).

<i>Version Number</i>	<i>Date Last revised</i>	<i>Revised By</i>
1.0	13/04/2018	DPO
1.1	28/04/2020	DPO