

# PRIVACY POLICY

WE CAPTURE INFORMATION ABOUT YOU IN ORDER TO IMPROVE YOUR EXPERIENCE AS A CLIENT.

To help us give you more of personalised service, we capture information about you in order to improve your experience.

**We are PAL Fitness Education Community Interest Company (PAL CIC)  
of  
21 Fairoak Drive  
Bromsgrove  
Worcester  
B60 3PN**

This notice is to inform you about how we collect and protect any personal information you provide to us and how you can control what personal information we collect from you and what we do with it. It sets out how we intend to use your information, whom we will share it with and what rights you have about the use of your information.

This notice applies, however, you provide personal information to us, whether you go online to our websites, contact us via social media, engage in research activities or whether you telephone, email, write to or text us.

## WHAT PERSONAL DATA DO WE COLLECT?

We may collect the following information about you:

- your name, age/date of birth, gender and other relevant demographic information;
- your contact details: addresses, telephone numbers (including mobile numbers) and email address;
- your communication and marketing preferences;
- your correspondence and communications with us; and
- other publicly available personal data, including any which you have shared via a public platform (such as Instagram, YouTube, Twitter or public Facebook page).

This list is not exhaustive and in specific instances, we may need to collect additional data for the purposes set out in this notice. Some personal data is collected directly, for example when you subscribe to us on our website or send an email. Other personal data is collected indirectly, for example when you browse our websites. We may also collect personal data from third parties who have your consent to pass your details to us, or from publicly available sources. We may anonymise and aggregate personal data for insight and research, but this will not identify anyone.

## HOW WE USE YOUR DATA

### General

PAL CIC uses your personal data:

- to provide services to you;
- to make a tailored website available to you;
- to manage any account(s) you hold with us;

- to verify your identity;
- with your agreement, to contact you about promotional offers, events, products and services which we think may interest you;
- to show you promotional communications through online media as you browse the web;
- for analysis, insight and research purposes - to better understand your needs and ensure we are giving you what you want;
- to enable us to manage customer service interactions with you; and
- where we have a legal right or duty to use or disclose your information (for example in relation to an investigation by a public authority or in a legal dispute).

## HOW WE PROTECT YOUR DATA

Our controls

PAL CIC is committed to keeping your personal data safe and secure.

Our security measures include: -

- encryption of data;
- regular cyber security assessments of all service providers who may handle your personal data;
- regular planning to ensure we are ready to respond to cybersecurity attacks and data security incidents;
- daily penetration testing of systems;
- security controls that protect our IT systems infrastructure and our premises from external attack and unauthorised access;
- internal policies setting out our data security rules for our personnel; and
- regular training for our employees.

## YOUR RIGHTS

You have the following rights:

- the right to be informed about our processing of your personal data which is the aim of this notice;
- the right to request access to personal data we hold about you at any time;
- the right to ask us to update and correct any out-of-date or incorrect personal data that we hold about you;
- the right to object to the processing of your personal data and/ or to withdraw any consent you have given us and to opt-out of any marketing communications that we may send you;
- the right to prevent processing that is likely to cause damage or distress to you or anyone else;
- the certain rights in relation to automated decision-making including profiling;
- the right to request that we erase your personal data in certain circumstances (the right to be forgotten) for example when the data are no longer necessary for the purpose for which we collected them;
- the right to have your personal data provided to you by us in a structured, commonly used and machine-readable format and transmitted to another data controller. This is known as the right to data portability