

# How We Use Your Information

## Privacy Notice for Members and Users of the King's Club

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### Introduction

The King's Club is managed by KCS Enterprises Ltd King's College School, Southside, Wimbledon Common, London SW19 4TT. This notice is to help you understand **how** and **why** the King's Club collects personal information about you and **what** we do with that information. It also explains the decisions that you can make about your own information.

If you have any questions about this notice please contact the commercial director of KCS Enterprises Ltd at [ents@kcs.org.uk](mailto:ents@kcs.org.uk).

### What is personal information?

Personal information is information that identifies you as an individual and relates to you.

This includes your contact details, next of kin and financial information. CCTV, photos and video recordings of you are also personal information.

### How and why does the club collect and use personal information?

We set out below examples of the different ways in which we use personal information and where this personal information comes from. The club's primary reason for using your personal information is to administer the services of the club to members, prospective members and to other people using the club's facilities.

- We obtain information about you from membership forms and when you register for a course or an activity. This includes capturing your image for our membership database.
- We use CCTV to make sure the club site is safe. CCTV is not used in private areas such as toilets.
- We may, take photographs or videos of you at club events to use on social media and on the club website.
- We may send you information to keep you up to date with what is happening at the club. For example, by sending you information about events, activities and promotions, important developments such as the development of new facilities, changes to rates or terms and conditions.
- We may use information about you if we need this for statistical purposes or to assist or improve the administration of the club.

### Financial information

- We will process financial information about you in relation to the payment of club and course fees.

### Sharing personal information with third parties

- In accordance with our legal obligations, we may share information with local authorities and the police.
- We will share information about you with Clubwise, who run our database management system.
- We may also need to share information with our legal advisers for the purpose of obtaining legal advice.
- Occasionally we may use consultants, experts and other advisors to assist the club in fulfilling its obligations and to help run the club properly. We might need to share your information with them if this is relevant to their work.
- We may share some information with our insurance company, for example, where there is a serious incident at the club.
- We may need to share information if there is an emergency, for example, if you are hurt whilst on club premises.

### **Our legal grounds for using your information**

This section contains information about the legal basis that we are relying on when handling your information.

#### Legitimate interests

This means that the processing is necessary for legitimate interests except where the processing is unfair to you. The club relies on legitimate interests for most of the ways in which it uses your information.

Specifically, the club has a legitimate interest in:

- Providing health and leisure club services to its members and to others attending courses and classes at the club;
- Facilitating the efficient operation of the club; and
- Ensuring that all relevant legal obligations of the club are complied with.

#### Necessary for a contract

We will need to use your information in order to perform our obligations under our contract with you. For example, we need your name and contact details so that we can communicate with you about your membership of the club or the classes you have booked to attend.

#### Legal obligation

Where the club needs to use your information in order to comply with a legal obligation, for example to report a matter to the local authority or the police. We may also have to disclose your information to third parties such as the courts, the local authority or the police where legally obliged to do so.

#### Vital interests

For example, to prevent someone from being seriously harmed or killed.

The club must also comply with an additional condition where it processes special categories of personal information. These special categories are as follows: personal information revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic information, biometric information, health information, and information about sex life or orientation.

#### Vital interests:

To protect the vital interests of any person where that person cannot give consent, for example, if they are seriously hurt and are unconscious.

#### Legal claims:

The processing is necessary for the establishment, exercise or defence of legal claims. This allows us to share information with our legal advisors and insurers.

#### Medical purposes

This includes medical treatment and the management of healthcare services.

### **Consent to use your information**

We may ask for your consent to use your information in certain ways. If we ask for your consent to use your personal information you can take back this consent at any time. For instance if you play in a sports league we will ask for your consent to display your agreed contact details on the noticeboard so that other members of the league can contact you to arrange matches. Any use of your information before you withdraw your consent remains valid. Please speak to the commercial director if you would like to withdraw any consent given.

### **Sending information to other countries**

We may send your information to other countries where we store information on computer servers based overseas. We may send your information to other countries where we store information on computer servers based overseas.

The European Commission has produced a list of countries which have adequate data protection rules. The list can be found here: [http://ec.europa.eu/justice/data-protection/international-transfers/adequacy/index\\_en.htm](http://ec.europa.eu/justice/data-protection/international-transfers/adequacy/index_en.htm)

If the country that we are sending your information to is not on the list or, is not a country within the EEA (which means the European Union, Liechtenstein, Norway and Iceland) then it might not have the same level of protection for personal information as there is the UK.

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## **For how long do we keep your information?**

We keep your information for as long as you are a member of the club or while you are attending a class or course and for maximum of 6 years after you leave the club or (unless you re-enrol) until the course or class you are enrolled in has concluded. In exceptional circumstances we may keep your information for a longer time than usual but we would only do so if we had a good reason and only if we are allowed to do so under data protection law.

## **What decisions can you make about your information?**

From May 2018 data protection legislation gives you a number of rights regarding your information. Some of these are new rights whilst others build on your existing rights. Your rights are as follows:

- if information is incorrect you can ask us to correct it;
- you can also ask what information we hold about you and be provided with a copy. We will also give you extra information, such as why we use this information about you, where it came from and what types of people we have sent it to;
- you can ask us to delete the information that we hold about you in certain circumstances. For example, where we no longer need the information;
- you can ask us to send you, or another organisation, certain types of information about you in a format that can be read by computer;
- our use of information about you may be restricted in some cases. For example, if you tell us that the information is inaccurate we can only use it for limited purposes while we check its accuracy;

## **Further information and guidance**

The commercial director is the person responsible at the club for managing how we look after personal information and deciding how it is shared.

Like other organisations we need to keep your information safe, up to date, only use it for what we said we would, destroy it when we no longer need it and most importantly - treat the information we get fairly.

This notice is to explain how we use your personal information. The commercial director can answer any questions which you may have.

Please speak to the commercial director if:

- you object to us using your information for marketing purposes e.g. to send you information about club events. We will stop using your information for marketing purposes if you tell us not to; or
- you would like us to update the information we hold about you; or
- you would prefer that certain information is kept confidential.

If you consider that we have not acted properly when using your personal information you can contact the Information Commissioner's Office at [ico.org.uk](http://ico.org.uk).