Data Privacy Statement

Last Reviewed:	May 2023
Annual Review Date:	May 2024
Owner(s):	Joe Watson/Alex Shepherdson
Document/catalogue Reference:	PYT/DPS

Policy Statement

Project Y gather and process your personal information in accordance with this privacy notice and in compliance with the relevant data protection Regulation and laws. This notice provides you with the necessary information regarding your rights and our obligations, and explains how, why and when we process your personal data.

Policy Principles

Information That We Collect

Project Y processes your personal information to meet our legal, statutory and contractual obligations and to provide you with our products and services. We will never collect any unnecessary personal data from you and do not process your information in any way, other than as specified in this notice.

The personal data that we may collect from you is: -

- Name
- Date of Birth
- Home Address
- Personal Email
- Mobile Telephone Number
- Special Category Data (i.e. health/medical information, details about religion, sexuality etc)
- Bank details

We collect information in the below ways: -

- Online enrolment forms
- Online surveys

How We Use Your Personal Data

Project Y takes your privacy very seriously and will never disclose, share or sell your data without your consent; unless required to do so by law. We only retain your data for as long as is necessary and for the purpose(s) specified in this notice. Where you have consented to us providing you with promotional offers and marketing, you are free to withdraw this consent at any time. *The purposes and reasons for processing your personal data are detailed below: -*

- 1. We collect and store your personal data as part of fulfilling a contract with you
- 2. We collect and store your personal data as part of our legal obligation for business accounting and tax purposes



3. We may occasionally send you marketing information where we have assessed that it is beneficial to you as a client and in our interests. Such information will be non-intrusive and is processed on the grounds of legitimate interests

Your Rights

You have the right to access any personal information Project Y processes about you and to request information about: -

- What personal data we hold about you
- The purposes of the processing
- The categories of personal data concerned
- The recipients to whom the personal data has/will be disclosed
- How long we intend to store your personal data for
- If we did not collect the data directly from you, information about the source

If you believe that we hold any incomplete or inaccurate data about you, you have the right to ask us to correct and/or complete the information and we will strive to do so as quickly as possible; unless there is a valid reason for not doing so, at which point you will be notified.

You also have the right to request erasure of your personal data or to restrict processing (*where applicable*) in accordance with the data protection laws; as well as to object to any direct marketing from us. Where applicable, you have the right to data portability of your information and the right to be informed about any automated decision-making we may use.

If we receive a request from you to exercise any of the above rights, we may ask you to verify your identity before acting on the request; this is to ensure that your data is protected and kept secure.

Sharing and Disclosing Your Personal Information

We do not share or disclose any of your personal information without your consent, other than for the purposes specified in this notice or where there is a legal requirement. Project Y uses third-parties to provide the below services and business functions; however, all processors acting on our behalf only process your data in accordance with instructions from us and comply fully with this privacy notice, the data protection laws and any other appropriate confidentiality and security measures.

Quoox

We use Quoox as the gym management software system including membership information, booking and payments system and sales tools. The information we provide to them is your name, address, email address, phone number, date of birth, emergency contact, payment (bank) information and membership details.

For more information about Quoox, please read their Privacy Notice at: <u>https://quoox.com/</u> policies/privacy-policy/

<u>Transfers Outside the EU (if applicable)</u>

Personal data in the European Union is protected by the General Data Protection Regulation (GDPR) but some other countries may not necessarily have the same high standard of protection for your personal data. Project Y does not transfer or store any personal data outside the EU.

Consequences of Not Providing Your Data



You are not obligated to provide your personal information to Project Y, however, as this information is required for us to provide you with our we will not be able to offer all our services without it.

How Long We Keep Your Data

Project Y only ever retains personal information for as long as is necessary and we have strict review and retention policies in place to meet these obligations. We are required under UK tax law to keep your basic personal data (*name, address, contact details*) for a minimum of 6 years after which time it will be destroyed.

Where you have consented to us using your details for direct marketing, we will keep such data until you notify us otherwise and/or withdraw your consent.

Special Categories Data

Owing to the products, services or treatments that we offer, Project Y sometimes needs to process sensitive personal information (*known as special category data*) about you. Where we collect such information, we will only request and process the minimum necessary for the specified purpose and identify a compliant legal basis for doing so.