



# The Art of Boxing Privacy Policy

## Privacy & your Personal Data

The Art of Boxing Ltd is committed to protecting the privacy of our users & customers. This Privacy Policy is intended to inform you on how we gather, define & utilise your Information (as defined below).

It applies to Information collected by us, or provided by you, whether in our studio, over our website (including the mobile optimised version of the website accessible from your portable hand-held device), or in any other way (such as over the phone). It is also intended to assist you in making informed decisions when using our website, our products & services. Please take a minute to read & understand the Policy.

All your personal Information shall be held & used in accordance with the EU General Data Protection Regulation 2016/679 (“GDPR”) & national laws implementing GDPR & any legislation that replaces it in whole or in part & any other legislation relating to the protection of personal data. If you want to know what information we collect & hold about you, or to exercise any of your rights as set out below, please write to us at the below address or via email at [theartofboxing@outlook.com](mailto:theartofboxing@outlook.com) / FAO: GDPR Representative, The Art of Boxing Ltd, 12 St Georges Court, George Street, Romford RM1 2EB.

The Art of Boxing Ltd is the controller of your Information for the purposes of the GDPR & is a Company registered under number 10394935.

## What Information do we collect on our website?

When you visit our website (including the mobile optimised version of the website accessible from your portable hand-held device) you may provide us with personal information such as name, email address & mobile phone number (“Information”). You may provide us with Information in a number of ways:

- by supplying us with the Information as listed above, on an individual basis by using our enquiry form or subscribing to receive updates or offers from us. To utilise our online enquiry form, you must provide us with your name, email address and mobile number
- by corresponding with us by email, in which case we may retain the content of your email messages together with your email address & our responses. If responses are relating to our junior classes, details of your child may be retained such as their name and date of birth
- by purchasing a product using our online facility, your name and email address may be retained, and you will be contacted to redeem the service you have purchased
- through any preferences & areas of interest as advised by you on subscribing to our online services
- by Information provided when you use our mobile optimised website from your portable hand-held device

## **What Information do we collect when you contact us by phone?**

- your name & contact details (your name and sometimes your email address)
- your mobile number may be saved in our business mobile phone with your corresponding name
- your name, email address (if collected), mobile number and reason for your enquiry will be collected in a database to enable us to analyse statistics for business purposes.

## **What Information do we collect in our studio?**

When you arrive for the first time to participate in one of our services you will be required to complete some necessary documentation which includes a personal and contact details form and liability waiver which includes consent for use of personal image for multimedia release. These forms include your personal details, details of your next of kin (or parent/guardian if under 18), responses to a health questionnaire and your signature.

In some cases your photograph will be taken (if consented in above forms) and weight noted for those participating in our white collar events.

## **How we use your Information**

We will hold, use & disclose your Information for our legitimate business purposes including:

- to keep you up to date about important changes to our business. This may be via email, text message or whatsapp message
- as a member of The Art of Boxing Ltd, you will be added to a whatsapp group which we will use to keep you up to date about important changes to our business
- to direct-market products & services, advise you of news & industry updates, events, promotions & other information. Before we do so, you will be given an option to opt-out of such communications & an option to unsubscribe will also be provided with each communication
- to answer your queries
- to release Information to regulatory or law enforcement agencies, if we are required or permitted to do so.

We may process certain sensitive personal data (known as special category data in GDPR) where you include it in information you send to us, e.g. if you include information about your health in booking requests.

## **The legal basis for processing your Information**

Under GDPR, the main grounds that we rely upon in order to process your Information are the following:

- necessary for compliance with a legal obligation – we are subject to certain legal obligations which may require us to process your Information. We may also be obliged by law to disclose your Information to a regulatory body or law enforcement agency
- necessary for the purposes of legitimate interests – either we, or a third party, will need to process your Information for the purposes of our (or a third party's) legitimate interests, provided we have established that those interests are not overridden by your rights & freedoms, including your right to have your Information protected. Our legitimate interests include responding to requests & enquiries from you or a third party, optimising our website & customer experience, informing you about our products & services & ensuring that our operations are conducted in an appropriate & efficient manner

- consent – in some circumstances, we may ask for your consent to process your Information in a particular way.

### **How we share your Information**

In certain circumstances we will share your Information with other parties. Details of those parties are set out below along with the reasons for sharing it:

- trusted third parties for the purpose of white collar matching: in order to safely match our boxers, certain Information may be sent to third parties. This information may include a video, name, age, weight and boxing experience. We will never share your contact information
- regulatory & law enforcement agencies. As noted above, if we receive a request from a regulatory body or law enforcement agency, & if permitted under GDPR & other laws, we may disclose certain personal information to such bodies or agencies
- new business owners. If our business merges with or is acquired by another business or company, we will share your personal information with the new owners of the business or company & their advisors. If this happens, you will be sent notice of such event.

### **How long we hold your Information**

We will only retain your Information for as long as is necessary for the purpose or purposes for which we have collected it. The criteria that we use to determine retention periods will be determined by the nature of the data & the purposes for which it is kept. For example, if we receive your Information through a competition entry, we will retain your data for as long as is necessary to administer the competition. If we receive your Information when you apply for a job, we will retain your data for as long as is necessary to process your application & maintain application statistics. In certain circumstances, once we have deleted or anonymised your data, we may need to retain parts of it (for example, your email address), in order to comply with our obligations under GDPR or other legislation, or for fraud detection purposes.

### **Your rights relating to your Information**

You have certain rights in relation to personal information we hold about you. Details of these rights & how to exercise them are set out below. We will require evidence of your identity before we are able to act on your request.

- Right of Access. You have the right at any time to ask us for a copy of the Information about you that we hold, & to confirm the nature of the Information & how it is used. Where we have good reason, & if the GDPR permits, we can refuse your request for a copy of your Information, or certain elements of the request. If we refuse your request or any element of it, we will provide you with our reasons for doing so
- Right of Correction or Completion. If Information we hold about you is not accurate, or is out of date or incomplete, & requires amendment or correction you have a right to have the data rectified, updated or completed. You can let us know by contacting us at the address or email address set out above
- Right of Erasure. In certain circumstances, you have the right to request that Information we hold about you is erased, e.g. if the Information is no longer necessary for the purposes for which it was collected or processed or our processing of the Information is based on your consent & there are no other legal grounds on which we may process the Information
- Right to Object to or Restrict Processing. In certain circumstances, you have the right to object to our processing of your Information by contacting us at the address or email address set out above. For example, if we are processing your Information on the basis of our legitimate interests & there are no compelling legitimate grounds for our processing

which override your rights & interests. You also have the right to object to use of your Information for direct marketing purposes.

You may also have the right to restrict our use of your Information, such as in circumstances where you have challenged the accuracy of the Information & during the period where we are verifying its accuracy.

- **Right of Data Portability.** In certain instances, you have a right to receive any Information that we hold about you in a structured, commonly used & machine-readable format. You can ask us to transmit that Information to you or directly to a third party organisation. This right exists in respect of Information that you have provided to us previously & is processed by us using automated means. While we are happy for such requests to be made, we are not able to guarantee technical compatibility with a third party organisation's systems. We are also unable to comply with requests that relate to Information of others without their consent.

You can exercise any of the above rights by contacting us at the address or email address set out above. You can exercise your rights free of charge.

Most of the above rights are subject to limitations & exceptions. We will provide reasons if we are unable to comply with any request for the exercise of your rights.

### **Consent**

To the extent that we are processing your Information based on your consent, you have the right to withdraw your consent at any time. You can do this by unsubscribing via the link provided in any direct marketing communication, or contacting us at the address or email address set out above.

### **Changes to our Privacy Policy**

This privacy policy can be changed by us at any time. If we change our privacy policy in the future, we will advise you of material changes or updates to our privacy policy by email, where we are holding your email address.

### **Complaints**

If you are unhappy about our use of your Information, you can contact us at the address or email address above. You are also entitled to lodge a complaint with the UK Information Commissioner's Office using any of the below contact methods:

Telephone: 0303 123 11113

Website: <https://ico.org.uk/concerns/>

Post: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF