



Abbreviated

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PRIVACY POLICY

## Abbreviated Privacy Policy

### Places for People Leisure Limited Privacy Notice

Places for People Leisure, together with their subsidiary companies are committed to protecting your privacy when you use our services.

Our full Privacy Notice is available [here](https://www.placesforpeopleleisure.org/privacy/). <https://www.placesforpeopleleisure.org/privacy/>

The details below explain how we use information about you and how we protect your privacy.

We have a Data Protection Officer who makes sure we respect your rights and follow the law. If you have any concerns or questions about how we look after your personal information, please contact the Data Protection Officer, Michelle Rogerson, at [data.protection@placesforpeople.co.uk](mailto:data.protection@placesforpeople.co.uk).

### Who Are We?

This privacy notice (the “Privacy Notice”) applies to all personal information processing activities carried out by Places for People Leisure.

Our principal address is 80 Cheapside, London EC2V 6EE but you can search for your local centre here: <https://www.placesforpeopleleisure.org/find-centre/>

Places for People Leisure are part of Places for People Group. More information about the Places for People Group can be found at <https://www.placesforpeople.co.uk> and by clicking on ‘About Us’.

We respect individuals’ rights to privacy and to the protection of personal information. The purpose of this Privacy Notice is to explain how we collect and use personal information in connection with our business.

We may update our Privacy Notice from time to time. We would encourage you to visit our website regularly to stay informed of the purposes for which we process your information and your rights to control how we process it.

### Why we collect your Personal Information

#### Do you know what personal information is?

Personal information can be anything that identifies and relates to a living person. This can include information that when put together with other information can then identify a person.

Information we may collect about you may include (but is not limited to):

Name	Occupation
Address	Ethnicity
Telephone numbers	Bank details
Email addresses	Employment Status (only if applying for concessionary memberships)
Data of birth	
Gender	Health data

CCTV images

Dependent Details (only where applicable)

Computer IP address

**Did you know that some of your personal information might be classified as 'special'?**

Some information is 'special' and needs more protection due to its sensitivity. It's often information you would not want widely known and is very personal to you. This is likely to include anything that can reveal information relating to your:

Sexuality and sexual health

Religious or philosophical beliefs

Ethnicity

Physical or mental health

Trade union membership

Political opinion

Genetic/biometric data

We will only collect this type of information if it is necessary to your contract so that we can provide the right services to you.

We may at times need to share this information. We will only do this if we have your consent or if there are legal requirements for us to do so. We may receive information about you from other data controllers, such as the police who might tell us about a crime they are investigating where this impacts on your contract with us. If you give us this information about yourself when communicating with us, you do so because you consider it forms part of a legitimate interest for us to hold this information on our records.

If we ask for any sensitive personal data about you, we will always tell you why we need it and ask for your consent to hold it.

### **Why do we need your personal information?**

We may need to use some information about you to:

- deliver services and support to you;
- to carry out our obligations arising from any contracts entered into between you and us;
- manage those services we provide to you;
- service improvement
- prevention/detection of crime/fraud
- help investigate any complaints you have about our services;
- check the quality of our services;

### **How the law allows us to use your personal information**

There are a number of legal reasons why we need to collect and use your personal information.

Generally we collect and use personal information for the purposes of where:

- you are entering or have entered into a contract with us
- you, or your legal representative, have given consent
- it is necessary to protect someone in an emergency
- it is required by law
- you have made your information publicly available
- it is necessary for legal cases
- it is necessary for archiving, research, or statistical purposes

### **How we communicate with you**

At Places for People Leisure we believe in putting our customers in the driving seat when communicating. When we communicate with you we will do so either because it forms part of your

contract with us, we have your consent or where we have a legitimate interest to communicate with you.

We have outlined our primary communication activities below which tells you how we may communicate with you and how you can update your preferences.

#### Customer Service Communications

We may contact you or send communications to tell you about a service enhancement such as improvements to your local site or to keep you informed of your current membership status. We won't need your consent to communicate with you this way because we have assessed that it forms part of our agreement with you. We will contact you through email and SMS for these service communications.

Customer communications may also include customer surveys as we feel understanding your experiences to help us improve the service we provide you forms an integral part of our relationship. We do not ask for your consent to contact you for these surveys as we have assessed that it is in our legitimate interest to contact you in this case. You can tell us to stop at any time – all our customer surveys will always contain an easy opt-out link.

#### Customer Service Communications via SMS/text messaging and calls

If you supply us with your telephone contact details, we may use them to call or send you operational text messages.

Examples of operational text messages include:

- Confirming an appointment, that you have requested
- Emergency site updates from your local centre
- Asking you to contact a named person or department

#### Prospective Customer Communications

We would like to send you occasional messages and to keep you informed about products or service information when you make an enquiry with us. We will keep your contact information for six months after which time we will delete your data from our systems if you have not become a member or have not been communicating back with us. We will always give you an opt-out route when communicating with you. To make sure you keep receiving our latest offers beyond this time, email our central enquiries@pfpleisure.org inbox confirming your opt in or just speak to a member of our team at your local centre.

We may also contact you to follow-up on any failed online purchases where we feel we can offer assistance to you.

We do not ask for your consent to contact you for these product or service messages as we have assessed that it is in our legitimate interest to keep you informed for a limited period. You can tell us to stop at any time – all our communications will always contain an easy opt-out link. We will also contact you where we believe you may require support for abandoned online purchases.

#### Past Customer Communications

If you are a past member and have not opted out to marketing we would love to stay in touch. We will send you occasional messages and keep you informed about products or service information.

We will continue to share these updates with you for 3 months following the end of your membership, after which time we will stop this communication.

We will always give you an opt-out route when communicating with you. To make sure you keep receiving our latest offers beyond this time, email our central [enquiries@pfpleisure.org](mailto:enquiries@pfpleisure.org) inbox confirming your opt-in or just speak to a member of our team at your local Places Centre.

We do not ask for your consent to contact you for these product or service messages as we have assessed that it is in our legitimate interest to keep you informed. You can tell us to stop at any time – all our communications will always contain an easy opt-out link.

#### Prospective and Past Member Customer Communications via SMS/text messaging

If you supply us with your telephone contact details as part of your original enquiry or during your past membership and have not opted out to marketing, we may use this information to send you a monthly update on products and services that we believe are of interest to you via SMS. We understand that not everyone wants to receive marketing through SMS, so if you wish to opt out to these messages please use the opt-out link in the SMS message or contact us at [enquiries@placesforpeopleleisure.org](mailto:enquiries@placesforpeopleleisure.org), requesting to opt-out.

#### Consent and Your Preferences Centre

To support our ongoing relationship, we would like to send you information on other products and services we offer, and which we think will be of interest to you. We will rely on consent for the majority of our direct marketing. We will ask for your consent to communicate this type of information to you. You can remove your consent and ask us to stop at any time. At Places Leisure we have updated our online customer preference centre to enable customers to update their marketing consents. This provides easy access for you to update your consents to marketing and you can update your preferences at any time by logging on to your online account at:

<https://pfpleisure-pochub.org/LhWeb/Members/Home/marketingpreferences>

If you do not want to sign up for an online account but you want to update your preferences or remove your consent, please contact [enquiries@placesforpeopleleisure.org](mailto:enquiries@placesforpeopleleisure.org) and we can process your request. Alternatively, you can speak to the reception team at your local Places Centre.

#### Keeping your information secure

We store personal information both electronically and in paper form.

We implement security policies, processes and technical security solutions to protect the personal information we hold from:

- Unauthorised access
- Improper use or disclosure
- Unauthorised modification
- Unlawful destruction or accidental loss

When you contact us, we may ask you to provide us with some information so that we can confirm your identity. If other people (e.g. family members, support workers, solicitors) act on your behalf

we will take steps to ensure that you have agreed for them to do so. This may include asking them to provide us with supporting information to indicate your consent. We do this to protect you and to make sure that other people cannot find things out about you that they are not entitled to know.

Employees and third parties who have access to, or are associated with the processing of, your personal information are obliged to make reasonable efforts to safeguard it.