



## **ASE Data Protection Policy and Privacy Notice**

### **Abingdon School Enterprises Limited (trading as Abingdon Sport and Leisure “ASE”) Data Protection Statement**

#### **Background**

The current General Data Protection Regulation and UK Data Protection Bill are designed to cover the collection, storing, processing and distribution of personal data and your rights in relation to this data.

As a wholly owned subsidiary of Abingdon School, we follow the School’s Data Protection Policy wherever possible and practical. However, as a separate legal entity, we have put together this policy and Privacy Notice to clarify how we deal with our members’ data.

ASE is registered with the Information Commissioner’s Office (“ICO”). Our registration number is ZA218335.

#### **Policy Statement**

Any personal data we collect and use is treated in accordance with the Data Protection Law (currently the Data Protection Act 1998 and the General Data Protection Regulation). ASE will use your data for the purpose(s) stated at the time of its collection.

The legal basis for holding a member or a user’s data is contractual - in order to provide you with the service we have promised we will need to process the personal details you have given at the time of joining - this may include sensitive or special category personal information (please see below). We will additionally ask for specific consent at the time of joining ASE or using any of our facilities for the use of your personal information to send you details of further activities, events or programs operated by ASE that may be of interest to you. The basis for the processing of this personal data is consent.

## **What data do we collect?**

The personal data that the ASE collects may consist of (only the personal information we need will be collected, so, for instance, a theatre booking will have less personal data collected than a gym membership):

- Name
- Address
- Email address
- Tel no (landline and mobile)
- Emergency contact number
- Age confirmation for sports centre memberships
- Date of birth for Tilsley Track Pass and junior courses

Abingdon School and Abingdon School Enterprises occasionally will film, sound record or photograph events for archive and publicity purposes. If you have any questions or concerns, please feel free to contact a member of the team.

ASE may also collect sensitive or special category personal data including which we hold to protect your vital interests:

- Medical information (sometimes a customer's GP is required to authorise their use of the gym)
- Any medical conditions required for ASE courses

## **How we use your data**

ASE member or user data will be processed strictly in accordance with the Data Protection Law and in the legitimate interests of the Club in order to:

- Facilitate and administer the running of ASE
- Communicate and promote the events and activities of ASE (if consent has been given)
- Send publications, newsletters and general communications (if consent has been given)
- Carry out any other tasks critical to achieving the objectives of the company

## **Who has access to your data**

Within ASE, personal data may be shared between members of staff who legitimately need the information to carry out their duties. All ASE staff are trained appropriately on complying with the provisions of Data Protection Law. Managers are trained to ensure that within their areas their staff and workers are aware of their responsibilities and adhere to the relevant requirements and processes.

For the efficient running of our business, we may need to disclose your personal information to our parent company, Abingdon School for the purpose for which it was given. The amount of personal information shared within the School will be no more than is reasonably necessary. Your personal information may also be stored on our management and booking systems - in these cases, ASE requires a GDPR compliant contract with the data processor in order to assure ourselves that your data is held securely.

Data about members and users of ASE is held securely and is treated confidentially and with sensitivity.

The data will not be disclosed to any third parties (other than described above) or external organisations (except where we let you know in advance) and will not be transferred outside the EU.

### **How long do we keep your data?**

In the case of general membership information, ASE will keep your personal information whilst you remain a member of the club and for a maximum period of one year after your membership has ended.

In the case of booking for events (through the online Box Office or over the telephone), your data will be retained for a maximum of 2 years since the last activity on your account.

### **Subject rights under the DPA/GDPR**

You have certain rights with respect to the data held about you by ASE. You can make a written request to obtain access to the data held about you by ASE, subject to certain exemptions (a Subject Access Request). Further information on your rights are contained in the School's Data Protection Policy.

If you have any concerns about the ASE's handling of your personal data, please contact us directly on [ase.info@abingdon.org.uk](mailto:ase.info@abingdon.org.uk). You can also find details of your rights and how to make a complaint about the processing of your data under the DPA and GDPR at: [www.ico.gov.uk](http://www.ico.gov.uk).

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