



GDPR: DATA PRIVACY NOTICE FOR CLIENTS AND SUPPLIERS

Introduction

Health Shack Huddersfield Ltd ("We") are committed to protecting and respecting your privacy.

This policy (together with our terms and conditions at <http://healthshackhd.co.uk/Health-Shack-TandC.pdf> and any other documents referred to in it) sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

The rules on processing of personal data are set out in the General Data Protection Regulation (the "GDPR").

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DEFINITIONS

Data controller - A controller determines the purposes and means of processing personal data.

Data processor - A processor is responsible for processing personal data on behalf of a controller.

Data subject – Natural person

Categories of data: Personal data and special categories of personal data

Personal data - The GDPR applies to 'personal data' meaning any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier (as explained in Article 6 of GDPR). For example name, home address, private email address. Online identifiers include IP addresses and cookies.

Special categories of personal data - The GDPR refers to sensitive personal data as 'special categories of personal data' (as explained in Article 9 of GDPR). The special categories specifically include genetic data, and biometric data where processed to uniquely identify an individual. Other examples include racial and ethnic origin, sexual orientation, health data, trade union membership, political opinions, religious or philosophical beliefs.

Processing - means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

Third party - means a natural or legal person, public authority, agency or body other than the data subject, controller, processor and persons who, under the direct authority of the controller or processor, are authorised to process personal data.

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WHO ARE WE?

Health Shack Huddersfield Ltd is the data controller. This means we decide how your personal data is processed and for what purposes. For all data matters contact Annette Purves on 01484 907047 or email info@healthshackhd.co.uk or write to 2, Stocks Walk, Almondbury, Huddersfield, HD5 8XB.



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3 THE PURPOSE(S) OF PROCESSING YOUR PERSONAL DATA

We use your personal data for the following purposes:

Purpose/Activity	Category of data	Lawful basis for processing including basis of legitimate interest
To register you as a new customer	1. Identity 2. Contact	Performance of contract with you
To process and deliver your membership contract including: (a) Manage payments, fees and charges (b) Collect and recover money owed to us (c) Manage membership duration and renewals	1. Identity 2. Contact 3. Financial 4. Transaction 5. Usage of facilities	1. Performance of contract with you 2. Necessary for our legitimate interests (to recover debts owed to us)
To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy policy (b) Asking you to leave a review or take a survey	1. Identity 2. Contact 3. Profile 4. Marketing and communications	1. Performance of contract with you 2. Necessary to comply with a legal obligation 3. Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)
To administer and protect our business (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	1. Identity 2. Contact 3. Technical	1. Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) 2. Necessary to comply with a legal obligation
To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you	1. Identity 2. Contact 3. Profile 4. Usage of facilities 5. Marketing and communications 6. Technical	Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences	1. Technical 2. Usage of facilities	Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)
To make suggestions and recommendations to you about goods or services that may be of interest to you	1. Identity 2. Contact 3. Technical 4. Usage of facilities 5. Profile	Necessary for our legitimate interests (to develop our products/services and grow our business)
To regularly record medical data and body measurements to continuously monitor that your health and fitness programme is delivering the required benefits and is appropriate for you.	1. Identity 2. Medical data 3. Body measurements	1. Performance of contract with you 2. Necessary to comply with a legal obligation (duty of care) 3. Necessary for our legitimate interests (to keep our records updated and to study how customers benefit from our services)



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4 THE CATEGORIES OF PERSONAL DATA CONCERNED

With reference to the categories of personal data described in the definitions section, we process the following categories of your data:

Personal Data		
Category of data	Data processed	How the data is collected
Identity	1. Name 2. Membership number 3. Photograph 4. Gender	Face-to-face contact
Contact	1. Address 2. Telephone numbers 3. Email address	Face-to-face contact
Financial	1. Bank account details 2. Payment card details	Face-to-face contact
Usage of facilities	1. Name 2. Membership number 3. Photograph	Automatic check-in to salon using membership card and card reader
Financial	1. Name 2. Membership number 3. Payments, fees and charges received 4. Outstanding debts 5. Usage of facilities	1. Manual entry of payments, fees and charges into Health Shack's EZFacility Management System 2. Automatic payments received by Health Shack's EZFacility Management System
Profile and Marketing and Communications	1. Name 2. Membership number 3. Payments, fees and charges received 4. Outstanding debts 5. Usage of facilities 6. Health and fitness outcomes	Analysis and reporting of data held in Health Shack's EZFacility Management System
Technical	Technical and performance data relating to Health Shack's business systems	Monitoring of Health Shack's business systems by IT suppliers and EZFacility Management System.

Special Categories of Personal Data		
Category of data	Data processed	How the data is collected
Identity and Medical data	1. Name 2. Membership number 3. Date 4. Medical issues 5. Blood pressure 6. Heart rate 7. Body fat	Face-to-face contact and measurements
Body measurements	1. Height 2. Weight 3. Bust/chest 4. Arm 5. Mid-section 6. Waist 7. Tummy 8. Hips 9. Thigh 10. Knee 11. Calf 12. Inches lost 13. Weight loss 14. Waist/hip ratio 15. Body mass index	Face-to-face contact and measurements



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5 WHAT IS OUR LEGAL BASIS FOR PROCESSING YOUR PERSONAL DATA?

5.1 Personal data (article 6 of GDPR)

Our lawful basis for processing your general personal data is the consent of the data subject.

5.2 Special categories of personal data (article 9 of GDPR)

Our lawful basis for processing your special categories of data is consent of the data subject.

5.3 Consent Form

We will provide a digital consent form which the data subject can read in the salon and digitally consent to.

6 SHARING YOUR PERSONAL DATA

Your personal data will be treated as strictly confidential, and will be shared only with our authorized third party processor EZFacility (UK) Ltd.

7 HOW LONG DO WE KEEP YOUR PERSONAL DATA?

We keep your personal data for no longer than reasonably necessary for a period of 6 years in case of any legal claims/complaints.

8 PROVIDING US WITH YOUR PERSONAL DATA

You are under no statutory or contractual requirement or obligation to provide us with your personal data but failure to do so will mean that we will be unable to offer you a new Membership Agreement or, if you are an existing customer, to continue your current Membership Agreement.

9 YOUR RIGHTS AND YOUR PERSONAL DATA

Unless subject to an exemption under the GDPR, you have the following rights with respect to your personal data:

- The right to request a copy of the personal data which we hold about you;
- The right to request that we correct any personal data if it is found to be inaccurate or out of date;
- The right to request your personal data is erased where it is no longer necessary to retain such data;
- The right to withdraw your consent to the processing at any time, where consent was your lawful basis for processing the data;
- The right to request that we provide you with your personal data and where possible, to transmit that data directly to another data controller, (known as the right to data portability);
- The right, where there is a dispute in relation to the accuracy or processing of your personal data, to request a restriction is placed on further processing;
- The right to object to the processing of personal data, (where applicable i.e. where processing is based on legitimate interests (or the performance of a task in the public interest/exercise of official authority); direct marketing and processing for the purposes of scientific/historical research and statistics).



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10 TRANSFER OF DATA ABROAD

We do not transfer personal data outside the EEA.

If we wish to use your personal data for a new purpose, not covered by this Data Privacy Notice, then we will provide you with a new notice explaining this new use prior to commencing the processing and setting out the relevant purposes and processing conditions.

11 CHANGES TO OUR PRIVACY POLICY

Any changes we may make to our privacy policy in the future will be posted on this page and, where appropriate, notified to you by e-mail. Please check back frequently to see any updates or changes to our privacy policy.

12 HOW TO MAKE A COMPLAINT

To exercise all relevant rights, queries or complaints please in the first instance contact Annette Purves on 01484 907047 or email info@healthshackhd.co.uk or write to 2, Stocks Walk, Almondbury, Huddersfield, HD5 8XB.

If this does not resolve your complaint to your satisfaction, you have the right to lodge a complaint with the [Information Commissioners Office](https://ico.org.uk/global/contact-us/email/) on 0303 1231113 or via email <https://ico.org.uk/global/contact-us/email/> or at the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF, England.

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