

## Welcome to Spitfire Gym - Privacy Notice

**We respect your privacy and we are committed to protecting your personal data. This privacy notice informs you about how we look after your personal data which you may have provide to us and it tells you about your privacy rights and how the law protects you.**

This notice contains the following sections, please click on each one to navigate through the document or scroll through them. Also, please note that the Glossary will help you to understand the meaning of some of the terms used in this privacy notice:

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### 1. [Important information and who we are](#)

#### **Purpose of this privacy notice**

It is important that you read this privacy notice. It aims to give you information on how we collect and processes your personal data when you use this site or make an enquiry, book a lesson or sign up as a member. Please note, this website is not intended for children – children wishing to train in Boxing/Kickboxing/Karate will require their parents or legal guardian to contact us.

#### **Controller**

We are the controller and responsible for your personal data provided through this website.

We have appointed a data privacy manager who is responsible for overseeing questions in relation to this privacy notice. If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact the data privacy manager using the details set out below.

#### **Contact details**

Our details are: Spitfire Gym  
Data Privacy Manager  
Email address: spitfireboxing@gmail.com  
Postal address: 114 the Lakes, Larkfield, ME20 6GZ  
Telephone number: 07884 097251

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

#### **Your duty to inform us of changes**

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

#### **Third-party links**

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

## **2. The data we collect about you**

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together follows:

- **Identity Data** includes data which you provide via our enquiry form or membership agreement, such as first name, last name, marital status, title, date of birth and gender including such data in respect of any child who is intended to be the student and you are the parent or guardian.
- **Contact Data** includes email address and telephone numbers.
- **Training Data** includes details of attendance at tuition, and gradings/assessments undertaken,
- **Health data.**
- **Technical Data** includes [internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website].
- **Profile Data** includes [your username and password, purchases or orders made by you, your interests, preferences, feedback and survey responses].
- **Usage Data** includes [information about how you use our website, products and services].
- **Marketing and Communications Data** includes [your preferences in receiving marketing from us and our third parties and your communication preferences].
- **Financial Data** includes bank account and payment card details.
- **Transaction Data** includes details about payments to and from you and other details of products and services you have purchased from us.

We also collect and use Aggregated Data such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does not directly or indirectly reveal your identity. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy notice.

### 3. If you fail to provide personal data to us

Where we need personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with goods or services). In this case, we may have to cancel a product or service you have with us but will notify you if this is the case at the time.

### 4. How is your personal data collected

We use different methods to collect data from and about you including through:

**Direct Interactions** - You may give us your data by filling in a form or by corresponding with us by post, phone or email. This includes personal data you provide when you:

- Attend a trial lesson with us.
- Enquire about our products or services.
- Subscribe to our publications.
- Request marketing to be sent to you.
- Give us some feedback.
- Enter into an agreement with us for tuition. When you attend a lesson or grading event.
- **Automated technologies or interactions** - As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies and other similar technologies. Please see our cookie policy for further details.

**Third parties** - We may receive personal data about you from various third parties as set out below:

- Technical Data from the following parties including analytics providers such as Google Analytics, and advertising networks such as Google AdWords and Facebook.
- Contact, Financial and Identity Data from providers of technical, payment and delivery services such as Nest Management Limited.
- Contact and Identity Data from providers of introductory services such as Nest Management Limited (Get Into Martial Arts).

## 5. How we use your personal data

We only use your personal data when the law allows us to.

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate:

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To add details to our database of prospective customers.	(a) Identity (b) Contact (c) Student Details	(a) Necessary for our legitimate interests (To be able to respond to your enquiry).
Request health data prior to training to allow us to assess suitability to receive tuition.	(a) Relevant conditions	(a) Necessary for our legitimate interests.  (b) we will not store this data unless we have specific consent from you.
To add details to and update our customer management data bases and systems.	(a) Identity (b) Contact (c) Financial Data (d) Transaction Data (e) Training Data (f) Purchases of pro-shop items	(a) Performance of a contract with you.  (b) Necessary for our legitimate interests.
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	(a) Identity (b) Contact (c) Profile (d) Marketing & Communications	(a) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services).

To enable you to receive offers and information, other than answers to your enquiry or booking, providing you have opted in to that service.	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing & Communications	(a) Necessary for our legitimate interests (to study how customers use our products/services, to develop them and grow our business).
To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Technical	(a) Necessary for our legitimate interests. (b) Necessary to comply with a legal obligation.
To deliver relevant website content to you and measure or understand the effectiveness of any notices that we provide to you.	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing & Communications (f) 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.	(a) Technical (b) Usage	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).

### **Purposes for which we will use your personal data**

As described in the table above, but please note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table above.

### **Marketing**

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising.

### **Promotional offers from us - marketing**

We may use your personal data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products and services may be relevant for you (we call this marketing).

You may receive marketing communications from us if you have requested information from us or purchased services from us and, in each case, you have opted-in to receive that marketing.

### **Opting out**

You can ask us or third parties to stop sending you marketing messages at any time by sending an email to us or contacting us by phone or post. Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a service purchase, service experience or other transactions.

### **Cookies**

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly. For more information about the cookies we use, please see our cookie policy.

We use Google Analytics cookies to help understand how visitors engage with our website. Google uses a set of cookies to collect information and report website usage statistics without personally identifying individual visitors to Google ourselves.

We use Google Advertising cookies to help make sure only relevant and interested parties see our web advertisements. Google uses a set of cookies to collect information and serve adverts over their network without personally identifying individuals to Google ourselves.

We use Facebook Pixel to help make sure only relevant and interested parties see our Facebook advertisements Facebook uses a set of cookies to collect information and serve adverts over their network.

### **Change of purpose**

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

## **6. Disclosures of your personal data**

We may have to share your personal data with those set out below for the purposes set out above.

- External Third Parties as set out in the Glossary.
- Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy notice.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

## 7. International transfers

We do not transfer your personal data outside the European Economic Area (EEA).

## 8. Data security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

## 9. Data retention

### **How long will you use my personal data for?**

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

Details of retention periods for different aspects of your personal data are available in our Retention Policy which you can request by contacting us.

In some circumstances you can ask us to delete your data.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

## 10. Your legal rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data. Please see below to find out more about these rights:

- **Request access to your personal data:**  
Request access to your personal data (commonly known as a “data subject access request”). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- **Request correction of your personal data:**  
This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

If you become aware that We hold incorrect information please contact us and We will make the correction, for example: address changes and contact details changes such as address, telephone number or e-mail details.

- **Request erasure of your personal data:**  
This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing, where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- **Object to processing of your personal data:**  
Where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
- **Request restriction of processing your personal data:**  
Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data’s accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- **Request transfer of your personal data:**  
Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.



- **Right to withdraw consent:**

Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

If you wish to exercise any of the rights set out above, please contact us.

**No fee usually required**

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

**What we may need from you**

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

**Time limit to respond**

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

## 11. Glossary

**NEST Management Limited** a company which provides us with various services including tuition fee collection and administration, and business management software applications..

**We, us, our** means owners of this website and the business providing tuition and other services which you may be using or enquiring about through this site.

**Legitimate Interest** means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us.

**Performance of Contract** means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

**Comply with a legal or regulatory obligation** means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

**External Third Parties** means:

- National governing bodies, regulatory associations and similar organisations relating to the tuition subject acting as processors or joint controllers.
- Any franchisor acting as processor or joint controller who has granted us a franchise to carry on our business.
- Service providers acting as processors who provide IT and system administration services including but not limited to NEST Management Limited.
- Professional advisers acting as processors or joint controllers including lawyers, bankers, auditors and insurers who provide consultancy, banking, legal, insurance and accounting services.
- HM Revenue & Customs, regulators and other authorities acting as processors or joint controllers who require reporting of processing activities in certain circumstances.

## 12. Contact Details

The Data Protection Officer  
Spitfire Gym  
70 Gibson Drive, Kings Hill, ME19 4LG  
Tel: 07884 097251  
E-mail: spitfireboxing@gmail.com

## 13. Changes to our privacy notice

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. However, we advise that you check this page regularly to keep up to date with any necessary changes.