

# PORTWAY RDC PRIVACY POLICY

This website is operated by Portway Sports Centre Limited (CRN 14734049).

We take your privacy very seriously and we ask that you read this privacy policy carefully as it contains important information on:

- the personal information we collect about you
- what we do with your information, and
- who your information might be shared with.

We may change this privacy policy from time to time. You should check this policy occasionally to ensure you are aware of the most recent version that will apply each time you access this website.

## Who we are

Portway Sports Centre Limited (CRN 14734049) ('we' or 'us') are a 'data controller' for the purposes of the Data Protection Act 2018, the General Data Protection Regulation (EU) 2016/679 and any subsequent UK data protection legislation and we are responsible for, and control the processing of, your personal information.

## Who does this privacy policy apply to?

This privacy policy applies to our members, customers, visitors to our website [www.portwayrdc.com](http://www.portwayrdc.com) and those who contact us via our website or any of the contact methods specified on it.

What information do we collect and process?

### Personal information provided by you

During the course of your membership, being a customer, accessing our website, contacting us, or otherwise dealing with us, you may provide us with a range of personal data which we will use in the course of our business. This personal information may include:

- Your name or another unique identifier;
- Your address;
- Your age and/or date of birth;
- Your contact details (which may include your landline telephone number, mobile number, and/or email address);
- Payment or other financial details (e.g. payment card information, bank information);
- Professional information (e.g. job title and/or type, professional qualifications, industry);
- Your fitness and health;
- Your usage of our facilities; and
- Other related information.

### Information we collect automatically

Our website may collect certain information about you automatically (such as your IP address, geographical location, browser type and version, operating system).

## Personal information provided by third parties

Occasionally we may receive information about you from other sources (such as our suppliers, customers, or group companies), which we will add to the information we already hold about you in order to help us operate our business effectively.

## Personal information about other individuals

If you give us information on behalf of someone else, you confirm that the other person has appointed you to act on his/her behalf and has agreed that you can:

- transfer the personal data and give consent on his/her behalf to the processing of his/her personal data;
- receive on his/her behalf any data protection notices;
- give consent to the transfer of his/her personal data abroad; and
- give consent to the processing of his/her sensitive personal data (if applicable).

## How we use your data and our legal basis for processing your data

We may process your data for a variety of reasons, including to:

- manage your membership;
- deal with you as a customer of our services;
- provide support to you as a member or customer;
- display the website and its functionality and enable your interaction with it;
- provide content, communications or information you request;
- respond to a request, order, enquiry or complaint you may have;
- to create aggregated statistical data and other aggregated and/or inferred non-personal information, which we or our business partners may use to provide and improve our respective services;
- customise our website and its content to your particular preferences; and
- improve our website and services.

In some instances, we will rely on your consent to process personal data and where we do this, it will be flagged to you at the time.

When we use your personal information we are required to have a legal basis for doing so. There are various different legal bases upon which we may rely, depending on what personal information we process and why.

The legal bases we may rely on include:

- consent: where you have given us clear consent for us to process your personal information for a specific purpose;
- contract: where our use of your personal information is necessary for a contract we have with you, or because you have asked us to take specific steps before entering into a contract;
- legal obligation: where our use of your personal information is necessary for us to comply with the law (not including contractual obligations); or
- legitimate interests: where our use of your personal information is necessary for our legitimate interests or the legitimate interests of a third party (unless there is a good reason to protect your personal information which overrides our legitimate interests).

## Storage of your information and who your information might be shared with

We store your personal data on cloud-based servers based in the UK/EEA.

We may disclose your personal data to:

- other companies within our group to the extent that there is a legitimate interest in doing so to support our business aims;
- our agents and service providers, to the extent that they require access to the data in order to provide goods/services to us, in which case they will be bound by a contract requiring them to process personal data in accordance with the requirements prescribed by data protection law;
- law enforcement agencies in connection with any investigation to help prevent unlawful activity; and
- a third party purchaser if we sell our business, in which case, customer and user information will be a transferred asset.

## Keeping your data secure

We will use technical and organisational measures to safeguard your personal data in accordance with the law. While we will use all reasonable efforts to safeguard your personal data, you acknowledge that the use of the internet is not entirely secure and for this reason we cannot guarantee the security or integrity of any personal data that are transferred from you or to you via the internet. If you have any particular concerns about your information, please contact us (see 'How to contact us' below).

## Transfers of your information out of the EEA

We may need to transfer your personal data outside the European Economic Area (for example to suppliers such as Salesforce). We will only do this if appropriate safeguards are place in accordance with data protection legislation.

## How long do we keep your personal information?

We keep your personal information for as long as we need to for the purposes for which it was collected or (if longer) for any period for which we are required to keep personal information to comply with our legal and regulatory requirements.

## What rights do you have?

You are responsible for ensuring that information you provide to us is accurate, complete and up-to-date. You can review and change your information by contacting us.

You have a number of rights in relation to your personal data, these include the right to:

- find out how we process your data;
- request that your personal data is corrected if you believe it is incorrect or inaccurate;
- obtain restriction on our, or object to, processing of your personal data;
- if we are relying on consent, you can withdraw your consent to our processing of your personal data (including any direct marketing);
- if we are relying on legitimate interests for direct marketing, you can object to receiving such direct marketing;
- obtain a copy of the personal data we process concerning you. We will take steps to verify your identity before responding to your request. Once we have verified your identity we will respond as soon as possible and in any event within one month.

- lodge a complaint with the UK supervisory body, the Information Commissioner's Office (the ICO) here <https://ico.org.uk/>. If you have a concern or complaint about the way we handle your data, we ask that you contact us in the first instance to allow us to investigate and resolve the matter as appropriate.

If you would like to exercise any of your rights or find out more, please contact us.

## Changes to this Privacy Policy

We may change this Privacy Policy from time to time, and if we do so we will highlight any changes to these pages. If you continue to access or use our services after notified changes have come into effect, you will have agreed to the revised policy.

## How to contact us

Please contact us if you have any questions about this privacy policy or the information we hold about you.

If you wish to contact us, please send an email to [info@portwayrdc.com](mailto:info@portwayrdc.com) or write to us at our registered office: c/o Roxburgh Milkins Limited, Merchants House North, Wapping Road, Bristol BS1 4RW.

## Use of cookies

For information on the cookies we use and how to control your cookie settings, please visit our [Cookie Policy](#).