



Privacy Notice

Introduction

Welcome to South Lanarkshire Leisure and Culture Ltd's Privacy Notice.

South Lanarkshire Leisure and Culture Ltd (SLLC) respects your privacy and is committed to protecting your personal data. This privacy notice will inform you as to how we look after your personal data and tells you about your privacy rights and how the law protects you.

1. Important information and who we are

Purpose of this privacy notice

This privacy notice gives you information on how SLLC collects and processes your personal data when you use our services and this website for example when you sign up to our newsletter, purchase a service or take part in a competition.

This website is not intended for children, however we will collect data relating to children, when parents and guardians provide information about their children when registering their children for some of our services, for example dietary or medical information.

It is important that you read this privacy notice so that you are fully aware of how and why we are using your data.

Controller

SLLC is the controller and responsible for your personal data (referred to as "SLLC", "we", "us" or "our" in this privacy notice).

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 first name, maiden name, last name, username or similar identifier, marital status, title, date of birth and gender.
- **Contact Data** includes billing address, delivery address, email address and telephone numbers.
- **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.
- **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 third parties and your communication preferences.
- **Personal information** including information about attending events and meetings including information about dietary or access requirements.

We collect **Special Categories of Personal Data** about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). We may also receive information about criminal convictions and offences from time to time.

Why do we need your personal information?

We only ask for the minimum personal data necessary to provide the service you request or are entitled to. This includes and is not limited to identity data i.e. your name and contact details. Other data maybe required i.e. contact, financial, etc, depending on the nature of service you are participating in. The purpose of processing is the service or entitlement for which the information is being collected. Your personal data will not be used for any another purpose, unless further specified on the form collecting the information or otherwise provided to you as appropriate or as provided for by the law. We will also use your information to verify your identity where required, maintain our records, contact you by post, email or telephone.

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.

If you fail to provide personal data

Where we need to collect 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 services). In this case, we may have to cancel a service you have with us but we will notify you if this is the case at the time.

We have appointed a Data Protection officer (DPO) 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 DPO using the details set out below.

Email address: dpo@southlanarkshireleisure.co.uk

Postal address:

Data Protection Officer, South Lanarkshire Leisure & Culture, First Floor, North Stand, Cadzow Avenue, Hamilton, ML3 0LX

Telephone number:

01355 234078

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). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

Changes to the privacy notice

This privacy notice was last updated in May 2018.

We may change this Privacy Notice from time to time—please check our website regularly for updates.

3. How is your personal data collected?

You give us information about your identity, contact details and financial information when you contact us or make an enquiry, when you browse our website, when you attend a class or event.

We may also collect information:

- From publicly accessible sources, for example, Companies House and the Electoral Roll;
- From other public sector organisations such as South Lanarkshire Council;
- Directly from third parties who deliver services on our behalf;
- From customer due diligence providers;
- From credit reference agencies;
- From third parties with your consent;
- From your bank or building society, another financial institution or advisor;
- From law enforcement agencies;

- From consultants and other professionals we may engage;
- From your doctors, medical and occupational health professionals;
- Via our website - we use cookies on our website (for more information on cookies, please see our [cookies policy](#));
- Via our information technology (IT) and other systems;
- Via door entry systems and reception logs; and
- Via automated monitoring of our websites and other technical systems, such as our computer networks and connections, CCTV and access control systems, communications systems, email and instant messaging systems.

4. How we use your personal data

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you, for example providing you with sports and leisure services;
- Where we need to comply with a legal or regulatory obligation;
- For our legitimate interests or those of a third party (where our interests do not override your rights and interests);
- Where you have given us consent; and
- For operational reasons, such as ensuring safe working practices, improving efficiency, training, staff assessments and quality control.

Generally, the information we collect is only used for any purpose for which you submitted it to us, for any purpose made clear to you at the point it was collected or here in this Privacy Notice. These purposes may include:

- When we assess your application for membership;
- When we or third parties host events we will use your personal data to provide you with details, tickets and entry information and to provide the organisers with information to verify your attendance;
- When you subscribe to receive communications and other updates from us we use your personal data to provide communications and information about topics that you have expressed an interest in;
- When you contact us through our website or contact SLLC Customer Service, your information is used in order to respond to your enquiry;
- If you have a complaint we use your personal information as part of dealing with that complaint; and
- When marketing our own services to you.

Legitimate Interests: In relation to a number of uses of personal data we refer to above we are doing this on the basis that it is in our legitimate interests – or those of a third party – for us to do so. A legitimate interest is when we have a business or commercial reason to use your information, so

long as this is not overridden by your own rights and interests. These interests cover a number of aspects of our business operations, namely:

- Information, system, network and cyber security purposes, including the monitoring, detection and protection of our IT systems;
- System development and enhancement;
- Website analytics to determine web traffic and patterns of navigation;
- Internal analysis of clients for the purpose of planning strategy and growth;
- Defending legal claims;
- Anti-fraud purposes;
- “Know Your Customer” checks;
- Analysing your personal data for the purpose of profiling or direct marketing (when you have opted in);
- Ensuring that we are as efficient as we can be so we can deliver the best service for you at the best price;
- To allow us to provide bespoke services where requested by you;
- Protecting our commercially valuable information and also our intellectual property;
- Preventing and detecting fraud and/or criminal activity that could be damaging for us or for you;
- For credit control purposes and to make sure our clients can pay for the services we provide;
- To maintain our accreditations so we can demonstrate we operate to the highest standards; and
- Ensuring we are able to keep up to date with our clients and contacts and developments in their organisations.

5. Marketing

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

Promotional offers from us

We may use your Identity, Contact, Technical, Usage and Profile 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, services and offers may be relevant for you (we call this marketing).

You will receive marketing communications from us if you have requested information from us or if you provided us with your details when you [entered a competition or] registered for a promotion and, in each case, you have not opted out of receiving that marketing.

Opting in

When you become a new customer with us when either buying a product or service you will be asked if you would like to receive information about forthcoming South Lanarkshire Leisure and Culture events, activities, promotions and competition offers.

Opting out

You can ask us or third parties to stop sending you marketing messages at any time by following the opt-out links (unsubscribe) on any marketing message sent to you or by [contacting us](#) at any time.

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 [cookies policy](#).

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. Who do we share your information with?

We are legally obliged to safeguard public funds and are therefore required to verify and check your details internally or with other public bodies for fraud prevention purposes. We are

also legally obliged to share certain data with other public bodies and will do so where the law requires this. We will also share necessary and proportionate information with other regulatory and law enforcement bodies to comply with any lawful request they make or if it is in our own legitimate interests to provide information to them. We may share necessary and limited information with our processors who provide or support some of the services we deliver. We will only share this information if we are confident that they will follow our written instruction under a written agreement that safeguards and assures your rights. This data sharing is in accordance with our Information Use and Privacy Policy and covered in our full privacy statement on our website. If any specific sharing of your information is to be carried out with other parties this will be stated on the form along with the legal basis being used. We will not sell or rent your information to third parties.

Detailed below are some examples of the parties we may have to share your personal data with:

- External third parties including South Lanarkshire Council, the Police or other law enforcement agencies or health services;
- Third party product and service providers;

Artifax

This system is used for all hall and culture bookings as part of our Culture services.

Gladstone

This system is our leisure management system for bookings and admissions for our Leisure, Outdoor and Culture services.

Seatgeek

This system is used for our box office bookings as part of our Culture services.

Civica

This system is used for our Library services.

Q Busters

This system is used for our Super Series bookings as part of Leisure and Outdoor services.

- Financial and non financial intermediaries;

Royal Bank of Scotland

RBS is used to collect our direct debit for our membership services.

and

- Third sector support agencies.

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.

If you wish further information please contact customer services @ customer.services@southlanarkshireleisure.co.uk

7. International transfers

Whenever we transfer your personal data out of the EEA, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission. For further

details, see European Commission: Adequacy of the protection of personal data in non-EU countries.

- Where we use certain service providers, we may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe. For further details, see European Commission: Model contracts for the transfer of personal data to third countries.

Please [contact us](#) if you want further information on the specific mechanism used by us when transferring your personal data out of the EEA.

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.

8. 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 from us by [contacting us](#).

9. Your legal rights

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

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 the personal data that we hold about you. 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.

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 (see below), 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 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 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.

Withdraw consent at any time: if 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.