



---

## PRIVACY POLICY

HealthKix is a health and fitness company and everything we do is about improving the lives of children through sport. We are not a multi-national or data hungry PLC, but a humble small business that only captures and retains data to keep our members up to date on services which **they** have subscribed to. We are publishing this Privacy Notice so that our customers, clients, suppliers are informed about what we hold, why we hold it and how you can enact your rights under the Data Protection Act. We are committed to respecting your privacy. This policy is to explain how we may use personal information we collect before, during and after [your membership] with us. This policy notice explains how we comply with the law on data protection, what your rights are and the purposes of data protection. We will be the controller and processor of any of your personal information that we hold.

### **This policy notice applies to you if you are either:**

- An individual participant/trainee who has registered his/her interest in participating in a HealthKix service whose details we have collected from one of our affiliated governing bodies, schools or other third-party referrals;
- A parent or guardian of a trainee who has registered for membership to find out more about the services and events we have to offer; or
- A fan, participant or supporter of HealthKix who has contacted us to purchase any of our online merchandise and/or signed up to our mailing list to receive updates about upcoming events, offers and ways to get involved further with HealthKix.

References to we, our or us in this privacy notice are to HealthKix. Registered address: The Hollies, Trevanson Road, Wadebridge, Cornwall, PL27 7HD.

### **Data Collection**

When you sign up to HealthKix services, register to receive communications from us, or communicate with us, we may collect or obtain personal information about you, such as information regarding:

- Your name, gender and birth date.
- Your home address, email address and contact numbers.
- Copies of your passport and EHIC/GHIC card.
- A medical consent form/PAR-Q, including your medical conditions or disability (provided by parents for children).
- Your marketing interests, including any permission you have given us.
- Copies of participants are stored securely in encrypted and password secured athlete cloud-based folders; passports, EHIC/GHIC cards, insurance, medical consent and travel consent. Only the managers of HealthKix have access to the directories.
- Details of next of kin, family members, coaches and emergency contacts.
- Details of relevant qualifications, certifications and verifications (e.g. DBS certification, First Aid qualification).
- Records and assessment of performance based data such as 1 rep max or speed/distance times.
- Any disciplinary and grievance information.
- Any details required for the purposes of awarding scholarship funding or grants (including any means testing).

- Sometimes, from third parties, we collect information about you. For instance, if you are a child, your parents might send us information about you. Additionally, we may obtain details from the Disclosure and Barring Service and SE on the status of any DBS check you have been asked to take for certain positions or those working with children.

### **Disclosure of Data**

- We share personal information with any party you approve of.
- Your marketing interests, including any permission you have given us.
  - Copies of participants are stored in encrypted and password secured athlete folders which are inclusive of; passports, EHIC/GHIC cards, insurance, medical and travel consent. Only the manager of HealthKix has access to the directories.
- HealthKix uses your personal data to track and manage your participation in our training programmes.
- Where we depend on your consent, such as for email marketing consent, you can withdraw this consent by unsubscribing at any time.
- Medical history and consent are information we need on our trainees to ensure we are prepared for anything.
- Important medical notes may be shared with staff of HealthKix to ensure they are fully aware of any problem which may arise. We will keep this information where you (or your parent) have given permission.
- You may be asked to use the SE DBS system to undergo a Disclosure & Barring Service review. Your profile on the SE data management system as well as our records will document the outcome of this inspection.

### **Where we collect your information**

- We typically collect personal information about our members on our website at [www.healthkix.co.uk](http://www.healthkix.co.uk) when signing up to become a member or to purchase and/ or book any services or products we offer online. As well as when you make an enquiry and/or complaint or when you correspond with us by phone, e-mail or in some other way.
- If you are providing us with details of referees, next of kin, beneficiaries, family members and emergency contacts they have a right to know and to be aware of what personal information we hold about them, how we collect it and how we use and may share that information. Please share this privacy notice with them. They also have the same rights as set out in the "Your rights in relation to personal information" section below.

### **Use of your personal information internationally**

The personal information we collect may be transferred to and stored in countries outside of the UK and the European Union. Some of these jurisdictions require different levels of protection in respect of personal information and, in certain instances, the laws in those countries may be less protective than the jurisdiction you are typically resident in. We will take all reasonable steps to ensure that your personal information is only used in accordance with this privacy notice and applicable data protection laws and is respected and kept secure and where a third party processes your data on our behalf we will put in place appropriate safeguards as required under data protection laws. For further details please contact us by using the details set out in the "Contacting us" section below.

### **Use of personal information and data**

- To fulfil a request or service when an online booking/payment has been made.
- Processing payments.
- Contacting you.
- The arrangement of services or goods.
- Conduct our business.
- Track and monitor your involvement in our training programmes.
- To keep records of our performances and history.
- Send promotional materials and deals by post, phone or e-mail which consist of our business products and services.

- Where you provide us with consent.
- Direct marketing.
- We handle information regarding medical or disability, to ensure that we appropriately support you and to determine if you are medically fit for our services.
- Purposes required by law.
- Legal requirements which are inclusive of accounting records and health and safety documents.
- Where a staff member works with children, we ensure that an acceptable DBS check has been completed.

### **Your rights in relation to personal information**

- The right to be informed about how your personal information is being used.
- The right to access the personal information we hold about you.
- The right to request the correction of inaccurate personal information we hold about you.
- The right to request the erasure of your personal information in certain limited circumstances.
- The right to restrict processing of your personal information where certain requirements are met.
- The right to object to the processing of your personal information.
- The right to request that we transfer elements of your data either to you or another service provider.
- The right to object to certain automated decision-making processes using your personal information.

You should note that some of these rights, for example the right to require us to transfer your data to another service provider or the right to object to automated decision making, may not apply as they have specific requirements and exemptions which apply to them and they may not apply to personal information recorded and stored by us. For example, we do not use automated decision making in relation to your personal data. However, some have no conditions attached, so your right to withdraw consent or object to processing for direct marketing are absolute rights.

Whilst this privacy notice sets out a general summary of your legal rights in respect of personal information, this is a very complex area of law. More information about your legal rights can be found on the Information Commissioner's website at [www.ico.org.uk/for-the-public/](http://www.ico.org.uk/for-the-public/).

To exercise any of the above rights, or if you have any questions relating to your rights, please contact us by using the details set out in the "Contacting us" section below.

If you are unhappy with the way we are using your personal information, you can also complain to the UK Information Commissioner's Office or your local data protection regulator. We are here to help and encourage you to contact us to resolve your complaint first.

### **How long do we keep personal information for?**

The duration for which we retain your personal information will differ depending on the type of information and the reason why we collected it from you. However, in some cases personal information may be retained on a long-term basis: for example, personal information that we need to retain for legal purposes will normally be retained in accordance with usual commercial practice and regulatory requirements. Generally, where there is no legal requirement, we retain all physical and electronic records for a period of 7 years after your last contact with us. Exceptions to this rule are:

- Information that may be relevant to personal injury claims, or discrimination claims may be retained until the limitation period for those types of claims has expired. For personal injury or discrimination claims this can be an extended period as the limitation period might not start to run until a long time after you have been involved with us.

It is important to ensure that the personal information we hold about you is accurate and up-to-date, and you should let us know if anything changes, for example if you change your phone number or email address.

### **Contacting us**

In the event of any query or complaint in connection with the information we hold about you, please email [info@healthkix.co.uk](mailto:info@healthkix.co.uk) or write to us at The Hollies, Trevanson Road, Wadebridge, Cornwall, PL27 7HD. These details can also be used to request access to the personal information we

collect from you, change that information, or delete it in some circumstances. We will respond to your request within 30 days.

### **Changes to this notice**

We may update this privacy notice from time to time. When we change this notice we will update the version date at the bottom of this page. For significant changes to this notice we will try to give you reasonable notice unless we are prevented from doing so. Where required by law we will seek your consent to changes in the way we use your personal information.

### **Cookies**

In addition to the information which athletes or their parents (“Users”) supply to us through our Website, information and data may be automatically collected through the use of cookies. Cookies are small text files employed on the Website to recognise repeat users and allow us to observe behaviour and compile aggregate data in order to improve the Website for its Users. For example, cookies will tell us whether a User viewed the Website with sound or with text on their last visit. Cookies also allow us to count the number of unique and return visitors to our Website. Some of our associated companies may themselves use cookies on their own websites. We have no access to, or control of these cookies, should this occur.

Cookies may be either “persistent” cookies or “session” cookies. A persistent cookie consists of a text file sent by a web server to a web browser, which will be stored by the browser and will remain valid until its set expiry date (unless deleted by the User before the expiry date). A session cookie, on the other hand, will expire at the end of the User session, when the web browser is closed.

The law states that we can store cookies on a User’s machine if they are essential to the operation of the Website, but that for all others we need the User’s permission to do so. Although we do not use our own cookies, our Website, like very many websites, uses Google Analytics, provided by Google, Inc. (“Google”). This involves cookies to analyse how Users use the Website. This produces data about use of the website (including the User’s IP address). The data goes to Google which stores it on servers in the United States, to measure and understand the User’s use of the website. Google uses this to report on website activity to website operators and provide other services relating to website activity and internet usage. Google may also send this information to third parties where required to do so by law, or where such third parties process the information on Google’s behalf. Google will not connect the User’s IP address with any other data held by Google. We will ask for the User’s permission (consent) to place these cookies or other similar technologies on their device, except where these are essential for us to provide the User with a service that the User has requested. There is a notice on our home page which describes how we use cookies and requests the User’s consent to place cookies on the User’s device. The User may also refuse the use of cookies by choosing the appropriate settings on the User’s browser, however please note that if the User does this the User may not be able to use the full functionality of our Website. Unfortunately, we cannot accept liability for any malfunctioning of the User’s device or its installed web browser as a result of any attempt to turn off cookies. To find out more about cookies, including how to see what cookies have been set and how to manage and delete them, visit [www.aboutcookies.org](http://www.aboutcookies.org) or [www.allaboutcookies.org](http://www.allaboutcookies.org). We cannot access any personal data about the User from Google Analytics; therefore, we are not the Data Controller for the User’s Google Analytics profile data. The User should contact Google directly for this information. Details about Google Analytics’ privacy policy can be viewed online at [Google.com](http://Google.com).

**Version dated 20th April 2022**

