Coventry University Sport and Recreation Centre
Privacy Notice

Who are we?

In this Privacy Notice, the terms “we”, “our”, and “us” refer to the Coventry University Sport and Recreation Centre, which is part of the Coventry University Higher Education Corporation (the Data Controller), Priory Street, Coventry, United Kingdom, CV1 5FB (ICO registration number Z6939585). You can find the full details of the Group structure here.

As a controller of your personal data we are responsible for looking after it, and we will use it fairly, lawfully, and in a transparent manner.

Purpose

We are committed to protecting your privacy. This notice will help you understand how we look after, use, store and share your personal data, and how we meet our obligations under the General Data Protection Regulation 2016 and the Data Protection Act 2018 (Data Protection Laws). It supplements any other notices or statements we may provide to you.

What personal data do we collect?

“Personal data” is any information from which you can be identified, e.g. name, date of birth, contact details, identification numbers, photographs, and expressions of opinion about you.

The type of personal data we collect, and how we process it, can vary depending on your interactions with us.

Where applicable, we will collect:

- **identification and contact data** (including name, date of birth, gender, physical address, electronic contact details and telephone number, Student ID number, staff/ student ID card/ membership ID card number, payroll number);
- **family and spouse/partner details** and your relationships to other Coventry University Sports Centre members, in relation to a family specific membership;
- **financial data** (including invoices for services, receipts of payment);
- **survey data** (including information provided in response to surveys);
- **course data** (course of study and faculty), **sporting achievement data**, **sports coach and reference contact information and kit sizes** in reference to a sport scholarship;
- **club membership data** (specifically which sports club you are a part of);
- **attendance data**: **facility access**, details of bookings, activities, classes (including online classes), courses, or events you attended and when;
- **emergency contact data** (activity specific whereby a user under 16 is admitted).
Special Category Data

We may process your ‘special category data’ such as:

- biometrics (where used for ID purposes); and
- information about you health and/or disabilities,

We may process such special category data where you inform us that you have a health condition which may affect your ability to use our facilities or services, including where you have provided us with a doctor’s note detailing any such health conditions.

Other special category data we may process indirectly:

- religion;
- racial or ethnic origin;
- political views;
- trade union membership;
- sex life and sexual orientation (not directly, but by knowing your gender and the details of your spouse)

We will only process special category data where you have given your explicit consent for us to do so, where you have manifestly made the personal data public; for reasons of substantial public interest, for the provision of health treatment (physiotherapy), or when that processing is legally required.

Where do we get your personal data from?

We collect your personal data directly from you; during your visits to our website; if you visit and/or use our facilities; or through any other communication you have with us.

Except for your IP address data, when visiting our website we will only collect personal data when it is voluntarily submitted.

Information that you give us

You may share personal data about yourself and your circumstances by giving us information:

- on membership registration/ activity forms that you are required to complete and agree to, in order to become a member and use our facilities and/or services, or to use our facilities and/or services as a guest;
• when applying for a sport scholarship;
• when booking and attending a physiotherapy appointment;
• when signing up to participate in any virtual activities we provide;
• when filling in feedback forms and other documentation;
• when filling in forms on our website, registering and continuing to use our website;
• when giving us information about yourself in any communications with us either by telephone, e-mail, post or otherwise.

We need you to provide the personal data in the situations listed above so we can support you or give you information that you need and so that we can comply with our contractual obligations to you and our legal obligations.

If you do not provide this data, it may mean that you will be unable to register to use our facilities and services, and/or we may be unable provide you with the level of support and assistance that we usually provide.

Information that we collect about you

• details of visits to the facilities and use of services via an attendance monitoring sheet;
• facility and service activity booking information;
• details of your visits to our website including, but not limited to, Internet Protocol (IP) address used to connect your computer to the internet, MAC addresses, traffic data, location data, your login information, time-zone setting, browser type and version, browser plug-in types and versions, operating system and platform, weblogs, cookies and other communication data, and the resources that you access. For more information please see our Cookies Notice;
• data including your name and images captured on body-worn cameras or CCTV when you visit one of our facilities;
• as part of the events organised at our facilities and their associated buildings, as necessary for our legitimate interests, third party photographers may be on site. If you do not wish to be included in any photographs or live streamed events (such as graduation ceremonies which are recorded and available online), please ensure that you clearly express your wishes to a member of our staff or directly to the third parties.

Information that we receive from other sources

We may receive personal data about you from other third parties, including:

• your doctor, where you have provided us with a doctor’s note and they disclose information about your health and/or medical conditions;
• other members of the Coventry University Group;
• other Coventry University Group staff or students as part of our Case Reporting System;
• your parents, guardians or any other third parties who send us personal data on your behalf;
• accommodation providers to ensure that residents are entitled to certain memberships;
• sporting bodies (sports club/ coach);
• CUSU (club membership data);
• solicitors, where you have asked them to engage with us on your behalf.

Please note that we may combine all personal data that we collect about you, i.e. data we receive from other sources, data you give to us and data we collect.

Why do we need personal data and how do we use it?

• To register you as a member/ user of our facilities and services, record your usage and manage your relationship with us.
• To produce and provide you with a membership card (where applicable).
• To administer your membership and the contract between us.
• To process the booking of, and participation to an activity, class, course or event.
• To process the booking of, and participation to virtual activities and programmes.
• To enable you to request to use the facilities and services.
• For the purpose of processing payments and managing our accounts.
• To safeguard members by providing safe and secure environments and meeting health and wellbeing requirements, as well as the duty of care requirements in line with Health and Safety legislation, throughout the duration of their membership.
• To consider and review your application for a sport scholarship.
• To consider your eligibility for additional support memberships.
• To process the deposit (ID card) for equipment hire purposes.
• To arrange appropriate sports branded uniform.
• To carry out background and reference checks, where applicable.
• To agree special arrangements for sporting activities with lecturers/ course directors.
• To process the booking of and provide you with physiotherapy treatment and aftercare.
• Where an incident occurs such as personal belongings being left behind or stolen from hired lockers, additional information may be processed about you, depending on the type of incident and the content of the locker.
• Where there are concerns about the health, safety and wellbeing of you or others, to meet our contractual and legal obligations to you and protect your or their vital interests.
• To ensure health and safety of our members and staff and to prevent and detect crime including, for example, by processing CCTV images. Signs are in place to indicate where cameras are in use.
• If you submit a Data Subject Access Request or a Freedom of Information Request we will keep a record of that correspondence so as to deal with and/or respond to your request. We need information from you to locate the information you are looking for. This enables us to comply with our legal obligations under the legislation we are subject to. When we receive a request from you, we’ll set up an electronic case file containing the details of your request. This normally includes your contact details and any other information you have given us. We’ll also store, on this case file, a copy of
the information that falls within the scope of your request in order to maintain adequate records of information we have released to you.

• Similarly, if you report a data breach we will set up an electronic case file containing the details of the breach and we will keep a record of our correspondence with you. We need information from you to contain and mitigate the risk. This enables us to comply with our legal obligations under the legislation we are subject to.

• To communicate effectively with you by post, email, phone and including via the distribution of relevant newsletters, in order to form our contact with you and for our legitimate interest.

• To follow up after activities, classes, courses and events in order to gather feedback or take new enquiries.

• To manage any other ad-hoc enquiry you make and respond to it accordingly.

• To support the marketing and the promotion of Coventry University.

• To analyse our membership and participation information, in order to better understand how to provide and improve our goods and services.

• To inform you of any changes to our facilities or services, in line with our Terms and Conditions.

Where you share information with us about other individuals (for example to confirm a group booking) you shall ensure that you have the consent of those individuals to share their personal data with us.

Legal Claims

Personal data, including special category data, may be processed for the purpose of establishing, exercising or defending a legal claim.

Basis for using your personal data

We need a legal basis for any processing of personal data. This means that our processing must be for one of a limited number of reasons set out in the data protection laws. The legal bases that we rely on are:

The processing is necessary for the entry into or performance of a contract

When you register to use our facilities and/or services and become a member with us we enter into a contract with you. For us to fulfil our obligations under this contract (e.g. to facilitate and administer your membership), we will need to collect, process and share (as further detailed below) your personal data.

We may also process your personal data in order to take steps at your request, prior to entering into a contract with you.
Compliance with a legal obligation

Sometimes we process your personal data because we are legally obliged to do so, for example, in order to meet our health and safety or safeguarding legal obligations or we may be required to share your personal data with certain statutory bodies.

Legitimate interests

We may use your personal data (excluding special category data) as set out in this Privacy Notice for the legitimate interests of Coventry University including:

- improving the quality and functionality of our website;
- keeping adequate records; and
- enabling us to engage with you so that we can provide you with services.

We will always balance our legitimate interests in processing your personal data against your privacy rights.

Legitimate interest

We have a legitimate interest in processing your personal data as:

- you benefit from the provision of the services we provide;
- we need to ensure health and safety at our sites and have a legitimate interest in ensuring any related policies and processes are effective;
- we need to promote and advertise the Coventry University Sport and Recreation Centre to attract members it in the future;
- we have a legitimate interest in ensuring the security of our sites, and in assisting with the prevention and detection of crime.

Necessity - the processing is necessary for the purposes outlined in this Privacy Notice.

Impact of processing - such processing does not unreasonably intrude on your privacy.

Vital Interest

We consider it reasonable to process personal data for the protection of any interests that are essential for someone’s life.

Consent

Generally, we do not rely on consent as a legal basis for processing your personal data other than for requesting parental consent (where applicable) or for sending third party direct digital
marketing communications to you. You have the right to withdraw consent to marketing at any time by contacting us.

Where we wish to use your image in promotional videos and photographs, we will first obtain your consent, unless it is a group shot and you cannot be identified. In these circumstances we will use posters to inform you of photography/videography taking place.

If we require your consent to process your personal data in any other circumstances, we will contact you separately to request this.

**Processing of your personal data**

"Processing" means doing anything with the personal data, such as collecting, recording, organising, structuring, storing, adapting or altering, retrieving, accessing, consulting, disclosing, disseminating, aligning or combining, restricting, erasing or destroying or using the data in any way.

We will process your personal data for the purposes set out above, or as we otherwise notify you.

The personal data you provide will be subject to security measures and procedures to minimise the risk of unauthorised access, loss, theft or disclosure.

Your personal data will not be used for the purposes of automated decision making.

**How long do we keep your personal data for?**

We will only keep your personal data for as long as we need to in order to fulfil the purposes for collecting it, including satisfying any legal, accounting, or reporting requirements.

We consider a number of factors in deciding how long to keep your data: the amount, its nature and sensitivity, the potential risk of harm from unauthorised use or disclosure; the purposes for processing it, and whether we can achieve those purposes through other means; and the applicable legal requirements.

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 data indefinitely without further notice to you.

**Who do we share your personal data with?**

Your personal data may be disclosed to other organisations within the Coventry University Group (such as Protection or Health and Wellbeing Services) so that they can carry out their day to day activities and to provide you with adequate support, as well as to third parties, including to:
• the police and other crime and fraud prevention and detection agencies for crime prevention or detection purposes;
• government bodies and agencies, where we are legally obliged to do so, pursuant to a valid request;
• in the event that an individual, who is present in a place at the same time as you, tests positive for Covid-19, we will share your details with NHS Test and Trace who may contact you to provide appropriate advice;
• family and next of kin, in case of an emergency;
• solicitors and/or private scanning centres, where you have given your consent for us to do so;
• third parties we have engaged to provide processing activities on our behalf, where such processing is to be conducted under a formal data processing agreement that provides appropriate safeguards for your personal data and where it is necessary for our legitimate interests to do so, including processing for administrative and practical purposes.

Keeping your personal data secure

We are committed to the protection and security of your personal data. We will ensure that appropriate measures are taken against its unlawful or unauthorised processing, and against its accidental loss or damage. We are certified to Cyber Essentials.

How we may contact you

Please note that we may contact you in connection with the purposes set out above, by post or by electronic means (including telephone, text messages, email, social media messaging, or any other suitable electronic method).

Your Data Protection Rights

You have the right to:

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 that 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 that we hold about you corrected, although we may need to verify the accuracy of the new personal data.

Request erasure of your personal data. This enables you to ask us to delete or remove personal data if:

• there is no good reason for us continue processing it;
you have successfully exercised your right to object to processing (see below); you believe we may have processed your personal data unlawfully; or we are required to erase your personal data to comply with the law.

Please note that we may not be able to comply with your request for specific legal reasons which, if applicable, will be notified to you.

Object to processing of your personal data when we are relying on public task or a legitimate interest (or those of a third party), and you feel that this processing impacts on your fundamental rights and freedoms. However, these may be overridden by the public interest or our legitimate interest grounds.

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:

- if you want us to establish the accuracy of the data;
- where our use of the data is unlawful but you do not want us to erase it;
- where you need us to hold the data even if we no longer require it (for example if you need it to establish, exercise or defend legal claims); or
- If you have objected to our use of your data, but we need to verify whether we have overriding public interest or legitimate interest grounds to use it.

Request the transfer of your personal data to you or to a third party. We will provide your personal data in a structured, commonly used, machine-readable format. Please note that this right only applies to automated data that you initially provided consent for us to use, or where we used the data to perform a contract with you.

Withdraw consent at any time when we are relying on consent to process your personal data. This will not affect the lawfulness of any processing carried out before you withdraw your consent. You can ask us to stop sending you marketing messages at any time by following the “unsubscribe” (or similar) links on any marketing message sent to you, or by contacting us at any time.

When you opt out of receiving these marketing messages you will no longer hear from us in that regard.

Exercising your rights

If you wish to exercise any of your above rights, please send a written request to the Information Governance Unit, Coventry University, Portal House, 163 New Union Street, Coventry, CV1 2PL, or email dsar@coventry.ac.uk.
You will not have to pay a fee to exercise any of your 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.

We may need to confirm your identity. 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 order to speed up our response.

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

Complaints and questions

We have appointed a Data Protection Officer to oversee compliance with this Privacy Notice. If you have any concerns or complaints about it, please contact the Data Protection Officer at Coventry University, Priory Street, Coventry CV1 5FB or email dpo@coventry.ac.uk.

If you are not satisfied with the proposed resolution of your complaint, you have the right to contact the Information Commissioner’s Office. Further information can be found on the Information Commissioner’s website at www.ico.org.uk or via their helpline on 0303 123 1113.

We reserve the right to update this Privacy Notice at any time, and we will provide you with a new Privacy Notice when we make any substantial updates. From time to time, we may also notify you in other ways, about the processing of your personal data.

Feedback

If you have feedback for us about this privacy notice, please let us know by emailing enquiry.igu@coventry.ac.uk.