

Here at Freestyle Martial Arts, we appreciate how important your privacy is and recognise that we are being trusted with protecting it, so the purpose of this privacy notice is to give you a clear explanation about how we collect and use your personal data.

We think it's important that you read this privacy notice in full so that you understand what data we collect about you, how we collect, use and look after that data, what privacy rights you have and how the law protects you.

Purpose of this privacy notice

This privacy notice aims to give you information on how Freestyle Martial Arts collects and processes your personal data through your use of the website, including any data you may provide when you use our website, purchase products or services from us, complete a membership form and sign up to any of our mailing lists.

Our websites aren't intended for children under the age of 13 and we don't knowingly collect data relating to children.

It is important that you read this privacy notice together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy notice supplements the other notices and is not intended to override them.

Controller

For all of our services, the data controller – the company that is responsible for personal data – is Freestyle Martial Arts (licensed club location, e.g. Winey, Oxfordshire). Each club location is an independent licensed business and therefore is the data controller for their club and must fully comply with this Freestyle Martial Arts data protection policy.

We have appointed a data protection officer (DPO) who is the Chief Instructor and licensee of the club you train at, and is solely 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, you can contact your DPO in class, by phone or by email. If you are unable to contact your DPO, then please email us at: info@freestylemartialarts.com

How to contact us

Questions, comments and requests regarding this privacy notice are always welcomed, so if you have any or would like to exercise any of your legal rights, please don't hesitate to contact us. You can contact our DPO in class, by phone or by email. If you are unable to contact your DPO, then please email us at: info@freestylemartialarts.com

If you feel you need to, you also 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).

Changes to the privacy notice

We may change this privacy notice from time to time, to reflect how we are processing your data.

If we make significant changes, we will make this clear on our websites or by such other means of contact such as email, so that you are able to review the changes before continuing to use any Freestyle Martial Arts services.

This version of the privacy notice was last updated on the date set out at the bottom of the page and historic versions can be obtained by contacting us.

Third-party links

Our websites 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.

The personal 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 as follows:

- **Name and contact details** – this includes your name, title, address, email address and telephone numbers.
- **Data of birth information** – but we do not ask you for your age.
- **Health Conditions (optional)** – this includes physical injury, physical disability, medical condition, mental disability or learning disorder that may affect your ability to practice martial arts safely and effectively. Unless you have told us otherwise on your membership application form with a signed declaration by the student, parent or guardian, we do not collect any **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).
- **Criminal record and membership refusal information (optional)** – this includes any convictions, charges or police cautions, other than a motoring offence, or martial

arts membership refusal. Processing of personal data relating to criminal convictions and offences or related security measures based on Article 6(1) shall be carried out only under the control of official authority or when the processing is authorised by Union or Member State law providing for appropriate safeguards for the rights and freedoms of data subjects. Any comprehensive register of criminal convictions shall be kept only under the control of official authority.

- **Payment information** – this includes your bank account and/or payment card details.
- **Marketing preferences** – this includes your preferences in receiving marketing from us and your communication preferences.
- **Customer service history** – this includes interactions with us over the phone, via the website or on social media.
- **Information about your device and how you use our websites and apps** – this includes information you give us when you browse our websites, including your internet protocol (IP) address, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, as well as how you use our websites.

We also collect, use and share **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. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. 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.

If you don't provide personal data

You don't have to give us any of your personal data but, if you don't, you are unlikely to receive our optimal customer service experience. 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,).

Keeping your personal data up-to-date

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.

How we collect your personal data

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

- **Direct interactions.** You may give us your name and contact details and payment information by filling in forms or by corresponding with us directly in class, phone, email or otherwise. This includes personal data you provide when you:
 - make a general enquiry or book and induction through our website;
 - are emailed booking information or other related enquiry matters;
 - complete a membership application form (applicable by law for insurance purposes);
 - subscribe to our mailing lists or newsletters;
 - request marketing to be sent to you;
 - take part in a competition, promotion or survey; or
 - give us some feedback.
- **Automated technologies or interactions.** As you interact with our website, we may automatically collect information about your device and how you use our websites. We collect this personal data by using cookies, server logs and other similar technologies. For more information on cookies, please see our Cookie Policy on our website at www.freestylemartialarts.com/cookiepolicy
- **Third parties or publicly available sources.** We may receive personal data about you from various third parties and public sources such as information about your device and how you use our websites from analytics providers such as Google based outside the EU.

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.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.
- For certain processing purposes, we may request your **consent** to authorise the processing. For example, membership form.

Please contact us at info@freestylemartialarts.com if you need details about the specific legal ground we are relying on to process your personal data.

SERVICE MESSAGES, NOTIFICATIONS AND PROMOTIONAL OFFERS

We strive to provide you with choices regarding certain personal data uses, particularly around service messages, notification and promotional offers.

You will receive service communications from us if you have requested information from us or purchased services from us. You'll also receive these communications if you have said

that we can send them to you when you provided us with your details when you complete your membership application form, enter a competition or signed up for a newsletter.

You can tell us that you want to stop receiving service communications from us at any time by contacting us in person, directly by email, post or over the phone.

We'll process any such request as quickly as we can, but it might take a few days for all of our systems to be updated.

COOKIES

We use cookies on our websites. 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 the website may become inaccessible or not function properly. For more information about the cookies we use, please see our Cookie Policy at www.freestylemartialarts.com/cookiepolicy

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 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.

Sharing your personal data

We do not, and will not, sell any of your personal data to any third party – including your name and contact details and your payment information. We're serious when we say we're committed to protecting your privacy – we want to earn and maintain your trust, and we believe this is absolutely essential in order to do that.

We do, however, share your personal data with the following categories of companies as an essential part of being able to provide our services to you, as set out in this notice:

- Martial Arts Alliance, governing body for Freestyle Martial Arts
- The Companies that do things to get your purchases and services to you, such as payment service providers, (e.g. GoCardless).
- HM Revenue & Customs, regulators and other authorities acting as processors or joint controllers based in the United Kingdom who require reporting of processing activities in certain circumstances.
- Companies approved by you, such as social media sites (if you choose to log in via your accounts with them)

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.

Sending your personal data to countries outside Europe

In the unlikely event we need to transfer your personal data to third-party processors outside the European Economic Area (EEA), we will only do this if there are appropriate safeguards in place to make sure your personal data receives the same protection as when it is being processed inside the EEA.

Keeping your personal data secure

We're committed to keeping your personal data secure and 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.

How long we will keep your personal data for

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 by contacting us at info@freestylemartialarts.com

In some circumstances, you can ask us to delete your data: see the section detailing your legal rights below for further information.

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.

Your legal rights

You have lots of legal rights relating to your personal data. If you wish to exercise any of the rights set out above or if you have any questions or a complaint, please contact your DPO in class, by phone or by email. If you are unable to contact your DPO, then please email us at: info@freestylemartialarts.com

- *The right to request access to your personal data.*
- *The right to request correction of your personal data.*

- *The right to request erasure of your personal data.*
- *The right to object to processing of your personal data or to withdraw consent. Remember, you can always stop service communication messages by getting in touch via email, phone or post.*
- *The right to request restriction of processing your personal data.*
- *The right to request a transfer of your personal data to another service provider.*

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.

Glossary

We recognise that some of the privacy law terminology can be a bit complicated so we have included a Glossary at the end to provide a bit more detail on the meaning of some of the terms used in this privacy notice.

LAWFUL BASIS:

Legitimate Interest means the interest of our business in conducting and managing our business to enable us to give you the best service 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).

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. We will process your personal data on the basis that it is necessary for us to do so in order to perform a contract between us.

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.

YOUR LEGAL 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 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 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.

Freestyle Martial Arts Privacy Notice – version 1.3 (24-05-2018)