

PRIVACY NOTICE

BACKGROUND

Firehouse Fitness Limited (FHF) understands that your privacy is important to you and that you care about how your personal data is used and shared. We respect and value the privacy of everyone who uses our services and visits our website, www.firehousefitness.co.uk (“our website”) and we will only collect and use personal data in ways that are described here, and in a manner that is consistent with our obligations and your rights under the law.

Please read this Privacy Notice carefully and ensure that you understand it. Your acceptance of our Privacy Notice is deemed to occur upon your first use of our services and our website. If you do not accept and agree with this Privacy Notice, you must stop using our services and website immediately.

1. Definitions and Interpretation

In this Policy the following terms shall have the following meanings:

“Account”	means an account required to access and/or use certain areas and features of our website;
“Cookie”	means a small text file placed on your computer or device by our website when you visit certain parts of and/or when you use certain features of our website;
“personal data”	means any and all data that relates to an identifiable person who can be directly or indirectly identified from that data. In this case, it means personal data that you give to us via our website. This definition shall, where applicable, incorporate the definitions provided in the Data Protection Act 1998 (prior to 25 May 2018) and EU Regulation 2016/679 – the General Data Protection Regulation (“GDPR”) (post 25 May 2018);
“We/Us/Our”	Means Firehouse Fitness Limited, a limited company registered in England under company number 08658548, whose registered and main trading address is 349 Salters Road, Newcastle Upon Tyne, England, NE3 4HN.

2. What Does This Policy Cover?

This Privacy Policy applies to your use of our services and our website. If our website contains links to other websites, please note that we have no control over how your data is collected, stored, or used by other websites and we advise you to check the privacy policies of any such websites before providing any data to them.

3. Your Rights

3.1 As a data subject, you have the following rights under the GDPR, which this Policy and our use of personal data have been designed to uphold:

- 3.1.1 The right to be informed about our collection and use of personal data;
- 3.1.2 The right of access to the personal data we hold about you (see section 11);
- 3.1.3 The right to rectification if any personal data we hold about you is inaccurate or incomplete (please contact us using the details in section 13);
- 3.1.4 The right to be forgotten – i.e. the right to ask us to delete any personal data we hold about you (we only hold your personal data for a limited time, as



explained in section 5 but if you would like us to delete it sooner, please contact us using the details in section 13);

- 3.1.5 The right to restrict (i.e. prevent) the processing of your personal data;
 - 3.1.6 The right to data portability (obtaining a copy of your personal data to re-use with another service or organisation);
 - 3.1.7 The right to object to us using your personal data for particular purposes; and
 - 3.1.8 Rights with respect to automated decision making and profiling.
- 3.2 If you have any cause for complaint about our use of your personal data, please contact us and we will do our best to solve the problem for you. If we are unable to help, you also have the right to lodge a complaint with the UK's supervisory authority, the Information Commissioner's Office.
- 3.3 For further information about your rights, please contact the Information Commissioner's Office or your local Citizens Advice Bureau.

4. **What Data Do We Collect?**

Depending upon your use of our services and website, we may collect some or all of the following personal (and non-personal) data (please also see the section on our use of Cookies and similar technologies):

- 4.1 Name and job title;
- 4.2 Contact information including email address;
- 4.3 Demographic information such as post code;
- 4.4 Other information relevant to customer surveys and/or our services

5. **How Do We Use Your Data?**

- 5.1 All personal data is processed and stored securely, for no longer than is necessary in light of the reason(s) for which it was first collected. We will comply with our obligations and safeguard your rights under the Data Protection Act 1998 (prior to 25 May 2018) and the GDPR (post 25 May 2018) at all times. For more details on security see section 6, below.
- 5.2 Our use of your personal data will always have a lawful basis, either because it is necessary for our performance of a contract with you, because you have consented to our use of your personal data (e.g. by subscribing to emails), or because it is in our legitimate interests. Specifically, we may use your data for the following purposes:
 - 5.2.1 Providing and managing your account;
 - 5.2.2 Providing and managing your access to our website;
 - 5.2.3 Personalising and tailoring your experience on our website;
 - 5.2.4 Supplying our services to you (please note that we may require your personal data in order to enter into a contract with you);
 - 5.2.5 Personalising and tailoring our services for you;
 - 5.2.6 Replying to emails from you;
 - 5.2.7 Supplying you with emails that you have opted into (you may unsubscribe or opt-out at any time;
 - 5.2.8 Market research;
- 5.3 With your permission and/or where permitted by law, we may also use your data for marketing purposes which may include contacting you by email, telephone and/or text message with information, news and offers on our services. We will not, however, send you any unsolicited marketing or spam and will take all reasonable steps to ensure that we fully protect your rights and comply with our obligations under the Data Protection Act 1999 (prior to 25 May 2018) or GDPR (post 25 May 2018).
- 5.4 You have the right to withdraw your consent to us using your personal data at any time, and to request that we delete it.
- 5.5 Personal data shall be kept in a form which permits the identification of data subjects for no longer than is necessary for the purposes for which the personal data is processed. In certain cases, personal data may be stored for longer periods where that data is to be processed for archiving purposes that are in the public interest, for scientific or historical research, for legal reasons, or for statistical purposes (subject to the implementation of the appropriate technical and organisational measures required



by the GDPR to protect that data).

6. How and Where Do We Store Your Data?

- 6.1 We only keep your personal data for as long as we need to in order to use it as described above in section 6, and/or for as long as we have your permission to keep it
- 6.2 Your personal data may be transferred outside of the EU in order that we can deliver the terms of our contract to you. Where this occurs, we will ensure that your personal data receives the highest level of protection and we will ensure appropriate measures are put in place which are consistent with the data protection laws of the UK and the EU.
- 6.3 Data security is very important to us, and to protect your data we have taken suitable measures to safeguard and secure data collected.
- 6.4 Steps we take to secure and protect your data include:
- a) All emails containing personal data will be encrypted;
 - b) All emails containing personal data will be marked “confidential”;
 - c) Personal data will only be transmitted over secure networks;
 - d) Personal data will not be transmitted over a wireless network if there is a reasonable wired alternative;
 - e) Personal data contained in the body of an email, whether sent or received, will be copied from the body of that email and stored securely. The email itself and associated temporary files will be deleted;
 - f) Where personal data is to be sent by facsimile transmission the recipient will be informed in advance and should be waiting to receive it;
 - g) Where personal data is to be transferred in hardcopy form, it will be passed directly to the recipient or, where that is not possible, sent using Royal Mail;
 - h) All personal data transferred physically will be transferred in a suitable container marked “confidential”;
 - i) No personal data will be shared informally and if access is required to any personal data, such access should be formally requested from a Director of the Company;
 - j) All hardcopies of personal data, along with any electronic copies stored on physical media will be stored securely;
 - k) No personal data will be transferred to any employees, agents, contractors, or other parties, whether such parties are working on behalf of the Company or not, without authorisation from a Director;
 - l) Personal data must be handled with care at all times and will not be left unattended or on view;
 - m) Computers used to view personal data will always be locked before being left unattended;
 - n) No personal data will be stored on any mobile device, whether such device belongs to the Company or otherwise;
 - o) All electronic copies of personal data will be stored securely using passwords and encryption;
 - p) All passwords used to protect personal data will be changed regularly and will be secure;
 - q) Under no circumstances will any passwords be written down or shared. If a password is forgotten, it will be reset using the applicable method;
 - r) All software will be kept up-to-date. Security-related updates will be installed as soon as reasonably possible after becoming available;
 - s) No software will be installed on any Company-owned computer or device without approval; and
 - t) Where personal data held by the Company is used for marketing purposes, it will be the responsibility of the Directors to ensure that the appropriate consent is obtained and that no data subjects have opted out, whether directly or via a third-party service such as the TPS.



7. Do We Share Your Data?

- 7.1 We may sometimes contract with third parties to supply products and services to you on our behalf. These may include payment processing, delivery of services, search engine facilities, advertising, and marketing. In some cases, the third parties may require access to some or all of your data. Where any of your data is required for such a purpose, we will take all reasonable steps to ensure that your data will be handled safely, securely, and in accordance with your rights, our obligations, and the obligations of the third party under the law.
- 7.2 In certain circumstances, we may be legally required to share certain data held by us, which may include your personal data, for example, where we are involved in legal proceedings, where we are complying with legal obligations, a court order, or a governmental authority.
- 7.3 We may compile statistics about the use of our website including data on traffic, usage patterns, user numbers and other information. All such data will be anonymised and will not include any personally identifying data, or any anonymised data that can be combined with other data and used to identify you. We may from time to time share such data with third parties such as prospective investors, associates and partners. Data will only be shared and used within the bounds of the law.
- 7.4 In certain circumstances, we may be legally required to share certain data held by us, which may include your personal data, for example, where we are involved in legal proceedings, where we are complying with legal requirements, a court order, or a governmental authority.

8. What Happens If Our Business Changes Hands?

- 8.1 We may, from time to time, expand or reduce our business and this may involve the sale and/or the transfer of control of all or part of our business. Any personal data that you have provided will, where it is relevant to any part of our business that is being transferred, be transferred along with that part and the new owner or newly controlling party will, under the terms of this Privacy Notice, be permitted to use that data only for the same purposes for which it was originally collected by us.

9. How Can You Control Your Data?

- 9.1 When you submit personal data to us, you may be given options to restrict our use of your data. In particular, we aim to give you strong controls on our use of your data for direct marketing purposes (including the ability to opt-out of receiving emails from us which you may do by unsubscribing using the links provided in emails) and at the point of providing your details.

10. Your Right to Withhold Information

- 10.1 You may access certain areas of our website without providing any data at all. However, to use all features and functions available on our website you may be required to submit or allow for the collection of certain data.
- 10.2 You may restrict our use of Cookies. For more information, see section 12.

11. How Can You Access Your Data?

You have the right to ask for a copy of any of your personal data held by us (where such data is held). Under the GDPR, no fee is payable and we will provide any and all information in response to your request free of charge. Please contact us for more details at info@firehousefitness.co.uk or using the contact details below in section 13.

12. Our Use of Cookies

- 12.1 Our website may place and access certain first party Cookies on your computer or device. First party Cookies are those placed directly by us and are used only by us. We use Cookies to facilitate and improve your experience of our website and to provide



and improve our services. We have carefully chosen these Cookies and have taken steps to ensure that your privacy and personal data is protected and respected at all times.

- 12.2 All Cookies used by and on our website are used in accordance with current Cookie Law.
- 12.3 By giving your consent to the placing of Cookies you are enabling us to provide the best possible experience and service to you. You may, if you wish, deny consent to the placing of Cookies; however certain features of our website may not function fully or as intended.
- 12.4 Certain features of our website depend on Cookies to function. Cookie Law deems these Cookies to be “strictly necessary”. Your consent will not be sought to place these Cookies, but you may still block these Cookies by changing your internet browser’s settings as detailed below, but please be aware that our website may not work properly if you do so. We have taken great care to ensure that your privacy is not at risk by allowing them.
- 12.5 In addition to the controls that we provide, you can choose to enable or disable Cookies in your internet browser. Most internet browsers also enable you to choose whether you wish to disable all Cookies or only third party Cookies. By default, most internet browsers accept Cookies but this can be changed. For further details, please consult the help menu in your internet browser or the documentation that came with your device.
- 12.6 You can choose to delete Cookies on your computer or device at any time, however you may lose any information that enables you to access Our website more quickly and efficiently including, but not limited to, login and personalisation settings.
- 12.7 It is recommended that you keep your internet browser and operating system up-to-date and that you consult the help and guidance provided by the developer of your internet browser and manufacturer of your computer or device if you are unsure about adjusting your privacy settings.

13. **Contacting Us**

If you have any questions about our website or this Privacy Notice, please contact us by email at Info@firehousefitness.co.uk, by telephone on 0113 868 0022, or by post at Centaur House, 91 Great George Street, Leeds LS1 3LA. Please ensure that your query is clear, particularly if it is a request for information about the data we hold about you.

14. **Changes to Our Privacy Notice**

We may change this Privacy Notice from time to time (for example, if the law changes). Any changes will be posted on our website and you will be deemed to have accepted the terms of the Privacy Notice on your first use of our website following the alterations.

