

Privacy Policy

*This Privacy Policy takes effect on 15 January 2023 and remains in force until superseded by an amended or updated version. This version has been updated as part of a routine review.*

Your privacy is extremely important to Spirit Gymnastics Academy and we are committed to providing you with clear and transparent information about how we use your personal information. We value the trust and confidence you place in us when sharing your personal information with us. We will ensure robust measures are in place to keep your information secure and will only use it for the purposes outlined in this policy.

This policy outlines what personal information we collect about members, and how we use such information. You are entitled to view, amend or delete the personal information held about you. You can do this by emailing info@spiritacro.com.

What personal information we collect about members

Spirit Gymnastics Academy has a legitimate reason to collect and hold some personal information of members. This is so that we can manage your account and communicate with you in line with your preferences. The information we store about members is limited to the following: gymnast’s name and age, name of parent/guardian (if gymnast under 18), email address, telephone number, home address, relevant medical conditions.

We collect, store and use the information you provide using a membership management system called [LoveAdmin](https://www.loveadmin.com/). This system stores information securely, and does not use our member information for any purpose other than to allow us to look after your gymnast(s), manage your account and communicate with you. You can see LoveAdmin’s information on data protection [here](https://www.loveadmin.com/data-protection-and-security/).

In addition, it is a requirement for all gymnasts to be registered with and insured by the sport’s governing body, British Gymnastics. The information held by them is more detailed and is held securely. We have access to members’ information for legitimate uses, such as emergency contact numbers. For further information on how British Gymnastics collects, stores and uses personal information, you should visit their website here: <https://www.british-gymnastics.org/members-privacy-policy>

How we use our website

Our website does not collect any personal information automatically. There is no requirement to login using an email address. There are no analytics designed or commissioned by Spirit Gymnastics Academy gathering any data on the users of the website. All users of the website are anonymous to Spirit Gymnastics Academy. Standard Google Analytics are used to analyse search traffic leading to our website in order to help us improve our services; we do not make any attempt to identify the people or devices visiting our website.

Our website has a function to allow visitors to contact us, which requires that they enter a name and an email address as a minimum, and other personal information voluntarily. When we receive a contact message by this method, which arrives in an email, the information within it is treated in the same way as we treat all emails. We respond to the enquiry by return email, which may lead to further correspondence. Once the email conversation is concluded we delete it in line with our email policy below.

Our website links to other third-party websites, as well as to social media platforms Facebook, Instagram, TikTok and YouTube. We do not control the privacy policy for external websites, for further information you should refer to the relevant website’s privacy policy.

There are two password-protected areas of the website, for members and committee to access. These areas only require a password, which is supplied by Spirit Gymnastics Academy to those who are entitled to access these areas. No personal information is needed to access the password-protected areas of the website.

No personal information is displayed on the website, with the exception of specific articles, photographs or videos which promote or highlight the work and successes of Spirit Gymnastics Academy and/or its members. In all cases, individual consent is obtained before posting such information on the website.

Right to be forgotten: individual consent previously given to Spirit Gymnastics Academy to place personal information on the website can be withdrawn at any time. If Spirit Gymnastics Academy is notified by an individual that such consent is withdrawn, Spirit Gymnastics Academy will remove from the website any and all reference to that individual within 5 working days.

How we use social media pages.

We maintain a presence on social media platforms Facebook, Instagram, TikTok and YouTube. Data collected by these platforms is not controlled by us. For details on how they collect and use personal information you should visit their websites.

If you make contact with us through one of our social media platforms, we will respond to you in kind. We will not store any information about you by this method, unless you agree to us doing that.

From time to time we may post photographs and videos on our social media pages to showcase achievements and successes by Spirit Gymnastics Academy and/or our members. Individual permission to use imagery is obtained from members on joining and again at annual intervals. This consent can be withdrawn at any time by contacting info@spiritacro.com. In this instance we will endeavour to remove imagery from our social media platforms, although third party copying and re-posting is not controlled by Spirit Gymnastics Academy.

We often video gymnasts during training to help debrief them on their technique. Such videos are used only for this purpose and are deleted once used. In exceptional circumstances a video of this type might be very useful for future instructional use, which makes it desirable to keep the video for the longer term. In this case, specific permission will be sought from the affected persons before such a video is stored. This permission can be withdrawn at any time.

Communication with Spirit Gymnastics Academy

**Telephone**: we do not record calls or retain records of calls unless you agree. Our telephone system can take incoming messages. If personal information is given in such a message (eg phone number, email address) we will record such information appropriately, use it for the specific purpose intended, and then delete the message.

**Letter**: we will use the information you provide for the purposes of responding. We will keep your letter(s) and our response(s) for a maximum of 2 years after the matter is resolved. Once no longer required, letters will be securely shredded.

**Email**: we will retain your communication by email for up to 2 years. Periodically, we will delete all emails over 2 years old unless there is a specific and valid reason to retain an email communication. We will communicate with members by email, using the information given to us for that purpose. We will store members’ email addresses securely and use them only for the purpose of legitimate communications, which they have agreed to receive. Such communications include (but are not limited to): newsletters, requesting payments, conducting surveys, notifying and advertising events and making members aware of services that we believe they may be interested in. If members no longer wish to receive communication by email they can notify Spirit Gymnastics Academy.

Spirit Gymnastics Academy does not sell, rent, trade or give email lists to any other companies for marketing purposes.

Waiting list management

Demand for places at Spirit Gymnastics Academy is usually greater than the number of available places. We therefore operate a waiting list, which allows us to stay in touch with people who have expressed an interest in joining when a place becomes available. In order to do this, we ask them for permission to store personal information on LoveAdmin as follows: child’s name and age and any previous gymnastics experience, parent’s/guardian’s name, email address and phone number and any medical conditions we need to be aware of. We use this information only to stay in touch with them as agreed, and not for any marketing purposes.

At regular intervals we communicate with people on the waiting list to check they are still interested, and are happy for us to retain their details; if they are not, we delete any details we hold about them. When a place becomes available and a child becomes a member, their details are moved within LoveAdmin from Waiting List to the relevant class they are joining. Their details are then handled in the same way as other members.

Class registers

Spirit Gymnastics Academy records who attended each and every lesson using a system of paper registers. The only personal information these registers contain is the name of the gymnasts. In addition, these registers form an important part of our emergency procedures, since they accurately record who is on the premises at any given moment, so that in the event of an evacuation all personnel (particularly young children) can be accounted for.

Registers are kept for up to 2 years to keep track of attendance, and are then securely destroyed.

Accessing the Spirit Gymnastics Academy wifi system

Spirit Gymnastics Academy operates a wifi system to enable efficient and modern ways of working. When a personal electronic device connects to our wifi, certain data will be exchanged with the wifi router and may be stored. This includes: the type of device, its MAC or IP address, the date and time of access, the volume of data it accesses, the website(s) visited. We do not analyse such data.

Making payments to Spirit Gymnastics Academy

Most of the payments made to Spirit are through LoveAdmin, which uses industry-standard secure payment systems, to keep both information and money safe. Occasionally, however, members might make a payment in reception using a system called iZettle. When presenting your card to the iZettle machine, the iZettle application will store certain data about your card so that it can remember your card and issue a receipt on subsequent occasions without needing to enter details again. Spirit Gymnastics Academy has no control over this mechanism, nor do we use it to gather any data on members. For more information on how iZettle uses your information, you should visit their website here: <https://www.izettle.com/gb>.

Closed circuit television

The landlord of the building occupied by Spirit Gymnastics Academy has closed circuit television (CCTV) installed to protect his property. Cameras are installed on the outside of the building only, and will record people entering and leaving the building as well as certain areas of the car park and surrounds of the building. Although the recording device is located inside the building, Spirit Gymnastics Academy has no access to it, and is not permitted to view or use the footage recorded on it.

In exceptional circumstances such as to help the police investigate an offence, Spirit Gymnastics Academy may request access to the recorded footage, but the landlord is under no obligation to share it with us.

Spirit Gymnastics Academy has an internal CCTV installed, which continuously records video images from a number of cameras positioned in both Units 1 and 2. These images are only accessed in the event of an incident, for the protection of our members, their families, contractors and visitors. The images and video are not used for live streaming or to transfer to social media.

This internal CCTV system serves three functions:

* It provides a method of identifying any intruders in the event of a security incident to aid the police in their enquiries.
* It provides evidence to help investigate any complaints against officials, coaches or gymnasts, to help ascertain whether any behaviour was inappropriate.
* It provides a method by which parents in the reception/waiting room can view their children in Unit 2, as required by British Gymnastics, in lieu of viewing windows.

It is a condition of entry to Spirit Gymnastics Academy that members, families, friends, contractors and visitors accept that they will be filmed by the internal CCTV system.

Additional measures brought about by COVID-19

In normal business, Spirit Gymnastics Academy records who has attended lessons (see above) by using registers. This will continue during COVID-19 restrictions, should they be reintroduced at any point.

It is possible that we may need to collect and process additional personal information about employees, contractors, volunteers, members and any other visitors. This is so that we can meet our Health and Safety obligations during the COVID-19 pandemic.

We anticipate that we may need to **collect** the following information that we would not usually collect in normal times:

* Asking personnel whether they have any symptoms of COVID-19, or whether anyone in their household has any symptoms. The legal basis for this is a legal obligation to keep our facility as sterile as possible for other users.
* Keeping a record of who was in our premises on any given day and time, using a time in/out system. The legal basis for this is a legitimate interest in being able to track who has been in contact with each other.

We will keep such information until such time as the government advises it is no longer required.

We anticipate that we might need to **process** information differently as follows:

* If someone we ask says they have COVID-19 symptoms, or our temperature scans indicate they might have symptoms, we will act in accordance with our duty of care to ourselves, our employees, contractors, volunteers, members and any other visitors. This is likely to involve isolating the infected person and/or contacting a family member to ask them to collect the infected person. The legal basis for this is a obligation to maintain a safe working environment.
* Providing personal contact details when requested by NHS Test and Trace, to allow them to carry out their duty to contact people who may have been on our premises at the same time as an infected person. The legal basis for this is our obligation to comply with NHS Test and Trace.
* Informing anyone who has been in face to face contact with anyone who has reported to us that they have COVID-19 symptoms. This is so that other individuals can have the choice to get a COVID-19 test if they want to. The legal basis for this is our obligation under Health and Safety law.

Personal contact details are the same as those already held by British Gymnastics and on LoveAdmin. If asked by NHS Test and Trace, we will supply only the information they need to conduct their duty. For details of how they use personal information, visit their website here: <https://www.gov.uk/guidance/nhs-test-and-trace-how-it-works>.

Signed: ………………………………………………………………………………….

Name: Alastair Haigh

Position: Managing Director

Date: 15 January 2023