# King's Sport & Wellness Privacy Policy



#### Who we are and what we do

We are <u>King's Sport & Wellness</u>, delivering a range of opportunities for students and staff to get involved in sport and physical activity, with an ambition to be the most active university in London. We run social sport sessions through our <u>BeActive</u> programme, utilise exercise to improve mental health

We run social sport sessions through our <u>BeActive</u> programme, utilise exercise to improve mental health in the <u>Active Wellness Scheme</u>, support elite athletes through our <u>Performance programme</u> and operate four <u>gyms</u> across King's campuses and halls of residence.

#### What personal data we process

Examples of held and processed by King's Sport & Wellness include:

- Name, gender, date of birth, contact details, photo ID, K number, academic course details, en rolled faculty, employment, home gym site, ethnic background, disability status, information pertaining to your student or staff experience.
- Some of our services may process details of health-related matters such as previous injury, reasons for freezes or early cancellation, or fitness goals.
- Some of our services may require processing of bank details for pay monthly members.

# **Purposes of processing**

King's Sport & Wellness process personal data for administrative or practical purposes, or to support the member experience. Purposes include:

- Confirming eligibility for discounted membership rates.
- Confirming eligibility for certain programmes or offerings.
- Account, membership, and payments administration.
- Ensuring member safety when using King's Sport & Wellness facilities.
- Ensuring you or any emergency contacts are contactable in an emergency.
- Essential communications regarding our services (non-marketing).
- Aggregated view of our engagement, to improve the services that we offer.

### **Lawful Basis for Processing your Personal Data**

Processing of personal data by King's Sport & Wellness is covered by these legal grounds:

- The process is necessary for King's Sport & Wellness to fulfil the member contract as outlined in the read and agreed terms & conditions, or to support the delivery of services offered by King's Sport & Wellness. This includes granting access to our facilities, booking system, online services, as well as providing service announcements and reviews of our services.
- Certain circumstances require explicit consent from the user to legitimise the processing of data. This may include but is not limited to marketing and sales communications about additional services and offers by King's Sport & Wellness.

Consent will be requested during purchase or signup. You may withdraw your consent at any point. Withdrawal of consent will not affect the lawfulness of processing based on your consent before withdrawal. You can withdraw consent at any time by writing to kingssport@kcl.ac.uk

## **Sources of data**

King's Sport & Wellness obtains your personal data from the following sources:

- Information you provided to the University during the enrolment process as a student or member of staff.
- Information you provided to King's Sport & Wellness during signup for a membership account or pay as you go membership in person or online.
- Information you provided to King's Sport & Wellness via email, feedback or request forms, or in person communications with King's Sport & Wellness staff, including any communications relating to any service or programme offered by King's Sport & Wellness.
- Information you provided to other departments of the University (e.g. tenancy of student halls)

# Sharing your personal Data with other bodies

King's Sport & Wellness share your personal data with other teams within King's College London when:

- you have given your consent;
- it is necessary for your own safeguarding or the safeguarding of others;
- to comply with a legal obligation to which we are subject;
- to identify opportunities in improving the services and facilities that we offer the King's Community. This service improvement information will be aggregated only and no identifiable information will be shared for this purpose.

We also share your personal data with the following third-parties:

Openplay – Provide our membership and service management system Flow, and our activity tracking app King's Move. Member and pay as you go user data is received and stored by Openplay. Activity data from activity trackers linked to King's Move is received, processed, and stored by Openplay. We do not transfer your data outside the UK/EAA.

### Retention of your personal data

King's Sport & Wellness will retain your personal data for as long as:

- You remain on the main University database as a student or member of staff
- You have an active membership, account, or subscription with King's Sport & Wellness.

After which time it is securely deleted from King's Sport & Wellness systems. You can find the King's College London Records Retention Schedule here: <a href="https://www.kcl.ac.uk/about-kings/orgstructure/ps/audit/records/retention">https://www.kcl.ac.uk/about-kings/orgstructure/ps/audit/records/retention</a>

#### **Contact and Further Information**

If you require further information regarding your personal information and how this is used by King's Sport & Wellness please contact us at kingssport@kcl.ac.uk.

For more information about how King's College London processes your personal data, including your rights and who to contact to make a complaint, please see our Core Privacy Notice: <a href="https://www.kcl.ac.uk/terms/privacy">https://www.kcl.ac.uk/terms/privacy</a>