**SWEENEY’S BOXING**

**PRIVACY POLICY**

This privacy notice will help you understand how Sweeney’s Boxing uses and protects your personal data.

You can contact us either at our main office (Unit 35, 2 Maple Path, Lower Clapton, Hackney, London, England, E5 8FB), or via at email at hello@sweeneysboxing.co.uk if you have any concerns or wish to exercise your rights.

1. **OUR PROMISES**

Sweeney’s Boxing will never forget it’s your right to total transparency and control on how we use your data. As such we give you these promises:

* We will only collect data about you that is relevant and necessary.
* Your data will only be held on systems that meet compliance standards.
* Your data will only be accessed by those who need it and we will minimise the amount of data that is processed, wherever possible.
* We won’t share except for the marketing of our own services to you, where we are required to share it by law, if we need to inform a regulatory body or we need to fulfil our service commitments to you through a third party that meets our own privacy standards.
* We will always remember that it is your personal data, not ours. As such we will ensure complete transparency and openness with you wherever possible.
* We respect your rights as outlined in the next section and will respond to all requests promptly.
1. **YOUR RIGHTS**

You have the following rights over any data we hold about you:

* Right to object to processing at any time.
* Right to opt out of marketing at any time.
* Right to have inaccurate data corrected.
* Right to erasure of personal data from our database.
* Right to export of personal data.

You can read more about your rights [here](http://knowyourprivacyrights.org/). If you would like to uphold your rights then please contact us.

We hope that we can always help but if you are in dissatisfied with our response you also have the right to lodge a complaint with the Data Protection Authority. This can be done at <https://ico.org.uk/concerns/>

1. **HOW WE COLLECT YOUR DATA**

We mainly only process the data you have provided to us. This may be from:

* Filling in a form on our website or at our premises.
* Sending us your details.
* Providing your details to us at events.
* Signing up to a membership program.
* Your image being captured at our sites on CCTV systems.
* Using your membership.

If you belong to an organisation, we may also source your information from public databases and other sources for our legitimate interests.

1. **WHAT DATA WE COLLECT**

We try and minimise the data held and the exact data elements we hold will be dependent on your journey with us. Typically, data elements we collect is restricted to:

* Your personal contact details – email address, address, phone numbers and source of your data and any interaction we may have with you on social media platforms.
* Your company details if you have a corporate membership or referral or if we are marketing our services to your organization – as above but also company name, company related details associated with your employment, website and other public held information.
* Transmitted information – such as emails, texts, messaging, phone call information and recordings, voice mails, email, meeting notes, CVs and membership usage statistical information including bookings.
* Health and Fitness information - Information you voluntarily give us – for example when you request information or communicate with us.
* CCTV – we use CCTV at our sites for the purposes of security and prevention of crime for our employees and guests.

Some of this data is called “special category data” because it requires sensitive treatment. We handle this type of data particularly carefully.

When you visit our website we may also capture details of your visits such as pages viewed and the resources that you access. Such information includes traffic data, location data and other communication data.

Calls may also be recorded for information holding, quality and training purposes.

1. **HOW WE PROCESS YOUR DATA**

Data is processed/stored mainly on encrypted cloud services. We use several third parties for software and services.

We may use other external partners to help us fulfil our services, however, your data will never be shared or sold for the use these parties. We only store “special categories of data” on our platforms that demonstrate high standards of security.

We use the following safeguards with respect to data transferred outside the UK and European Union where an “adequacy decision” is not in place:

* The processing is within the same corporate group as our business or organisation and is obligated to uphold the same standards of Data Protection and Security as our UK entity. For example, our offices in Canada.
* Further to Section 119A of the Data Protection Act 2018 and noting Case C-311/18 in the European Court of Justice, if your data is transferred or processed outside of the UK or EEA we ensure the safeguards of International Data Transfer Agreements (IDTAs) or Addendums are enforced. Where this is not possible, we ensure that European Standard Contractual Clauses are entered.

We regularly review suppliers for data security compliance to ensure your data is safe and track where your data is held.

All our processes are subject to various internal policies to ensure that your data privacy and security is upheld.

1. **WHAT WE USE YOUR DATA FOR**

We process your data for several reasons:

* To fulfil a contractual obligation or service to you
* To better understand your needs.
* To improve our services and products.
* To send invitations to events and follow these up if you have signed up to them.
* To send you promotional emails containing the information we think you will find interesting.

We always ensure we have a “legal basis” to use your data for the purpose we have collected it for.

1. **DATA SHARING**

We may use remarketing services from third parties. These may rely on the use of cookies. You can read more about these in our Cookies Policy.

We never resell or share your data to any other party other than in the circumstances where we are legally required by law to disclose your personal information. If you have a corporate subscription, we may be obligated as part of our contract to share basic information with your employer such as the number of classes you have attended during a month. We will not provide any specifics or share any health and fitness statistics with them.

Our website and other materials sent to you may contain links to other third-party websites. We may also offer buttons to social media that link to third party services. We’re not responsible for the content or your data privacy these sites provide through their tools or sites.

1. **DATA RETENTION**

Dependant on the data you provide us and for what purpose it is provided we may need to retain your data based on your journey with us. Typically, your data is retained for a period of 2 years following the end of your membership with us except for financial transaction information which is held for 7 years. CCTV is retained for 90 days unless an incident is recorded.

If we process your data and you haven’t had a membership with us we will delete your data after 3 years. If you wish to find out more about your specific data retention, please contact us.

1. **DATA PERMISSIONS**

Every marketing email sent from us allows you to opt out of receiving emails from us, except for the purposes of fulfilling any contractual arrangements.

You can also contact us at the email address above and request to opt out, view, export or delete your data. If you request for your data to be deleted, your name and email address will be added to an exceptions list and all other data removed to the extent possible.

1. **LEGAL COMPLIANCE**

We seek to uphold our legal obligations as covered by the Data Protection Act 2018, General Data Protection Regulation 2016 and the Privacy and Electronic Communications Regulations. Our Data Protection Authority is designated as the Information Commissioners Office (UK)

This Privacy Policy is reviewed on a regular basis and was last reviewed in January 2025. We will post the most current version on our website.