

Kingston Trampoline Academy privacy policy

At Kingston Trampoline Academy we take your privacy seriously and are committed to complying with our legal responsibilities under data protection law.

This privacy notice tells you what to expect us to do with your personal information or that of your child when you make contact with us or use one of our services.

When we collect and use your personal information we are regulated under the General Data Protection Regulation which applies across the European Union (including in the United Kingdom) and we are responsible as 'controller' of that personal information for the purposes of those laws.

We ask that you read this privacy policy carefully as it contains important information on who we are, how and why we collect, store, use and share personal information, your rights in relation to your personal information and on how to contact us and supervisory authorities in the event you have a complaint.

Key terms

It would be helpful to start by explaining some key terms used in this policy:

We, us, our	means KTA Sport and Leisure Limited, a private limited company incorporated and registered in England and Wales with registered company number 07475667 and whose registered office address is at Image House Unit 8, 326 Molesey Road, Walton-On-Thames, England, KT12 3PD and trading as Kingston Trampoline Academy
Personal information	means any information relating to an identified or identifiable individual
Special category personal information	means personal information revealing racial or ethnic origin, political opinions, religious beliefs, philosophical beliefs or trade union membership, genetic and biometric data and data concerning health, sex life or sexual orientation

Who we are

We are KTA Sport and Leisure Limited. We trade as Kingston Trampoline Academy and provide the opportunity for our members to participate in our activities, which include leisure and athlete classes, competitions and other similar gymnastics activities.

We register with British Gymnastics who governs the sport, provides insurance for gymnastics clubs and individual members and offers competitions and events. It is a condition of British Gymnastics club registration that all our members also register as individual members of British Gymnastics.

We also affiliate to London Gymnastics, which runs competitions and events that we may participate in.

You can find out more about us at our website www.kingstontrampoline.co.uk/.

Our website

This privacy policy relates to your use of our website and it is also applicable to all products or services that we supply to you.

Where we provide links to websites of other organisations, this privacy policy does not cover how that organisation processes personal information. We encourage you to read the privacy policies on the other websites you visit.

The personal information we collect and use

Information we collect about you

We collect the following personal information:

- Your first name and last name*
- Your email address*
- Your telephone number(s)*
- Your home address*
- Your birthday*
- Your gender*
- Whether you are a member of British Gymnastics or not*
- Any relevant medical conditions and or disabilities and additional related information
- Parent or guardian contact details*
- Your emergency contact details*
- Your payment details*
- Your attendance at classes or events and achievement records*
- Your photograph*
- Any communications from, to or relating to you
- Any accident or incident reports including details of injuries

The information marked with an * above is essential for us to provide you or your child with membership and access to our services. It is your choice whether you provide all the information we have requested, but not providing information may affect our ability to meet your or your child's needs and to protect your or their well-being.

If you are a competitive gymnast, we record other information about you to support your training and participation in competition such as:

- Training and technical information
- Lifestyle information
- Nationality

If you attend an event or trip with us, we will also collect the following information (where relevant):

- Dietary requirements and any other relevant information that we need to know to ensure your needs are met
- Passport information, if the trip is abroad
- Medical cover or insurance details

How we collect personal information about you

We collect personal information in a variety of different ways. We will collect your personal information when you, for example:

- Register with us via our website.

It is important to note that the customer portal is an online software package that is owned and operated by iClassPro, Inc, a company based in the United States. iClassPro, Inc licence the software to us and allow us access to it pursuant to an agreement we have with iClass Pro, Inc. When you provide your personal information via the customer portal you are providing it to iClassPro, Inc and you will need to agree to its privacy policy, terms of use and other policies. iClassPro, Inc processes and/or stores your personal information for us and will share it with us

- Contact us via our website live chat facility or other various channels
- Visit or browse our website
- Are the customer of a business that we acquire

How and why we use your personal information

Under data protection law, we can only use your personal information if we have a proper reason for doing so, e.g.:

- to comply with our legal and regulatory obligations;
- for the performance of our contract with you or to take steps at your request before entering into a contract;
- for our legitimate interests or those of a third party; or
- where you have given consent.

A legitimate interest is when we have a business or commercial reason to use your information, so long as this is not overridden by your own rights and interests.

We will use your personal information for the reasons set out below:

- **Contractual purposes**

When you ask us to provide you with a service, such as membership, gymnastics classes, competitions, trips or other activities, or you buy a product from us, we usually need to use information about you to provide this product or service, for example:

- to contact you to confirm arrangements;
- to notify you about changes to terms and conditions;
- to tell you when it is time to renew membership or re-register for activities;
- to process payments or send you receipts required;
- to track your skills and development;
- to provide digital certificates; and
- to provide videos of achievement.

We use your personal information because it is necessary for the performance of the contract with you or to take steps, at your request, before entering a contract.

- **Legal obligations**

We have a duty of care to ensure it is safe for you or your child to take part in gymnastics activity and to keep you/them safe while participating. Some individuals may be at risk of harm from participating in gymnastics activity as a result of a pre-existing condition. It is in your interests that you let us know if there is any reason why taking part in gymnastic activity may be unsafe prior to participation.

With your agreement, we will review any information you provide and undertake risk assessments in consultation with yourself and any appropriate trained professionals e.g. medical consultants. When we ask participants to provide relevant health information such as details of medical conditions, medication needs, allergies or injuries, this is because we have a legal obligation.

When you tell us about any special needs such as disabilities or other support information we may use relevant information to comply with our legal obligations under the Equality Act 2010. We will review any information you have provided to help us identify any actions we can take to support inclusion. We may need to ask you for more information to help us to best meet your or your child's needs. We will keep a record of any steps we take to support inclusion.

- **Legitimate interests**

We rely on legitimate interests for the following purposes:

- **Responding to communications, concerns or complaints and seeking feedback from you about our services**

We will use the information you provide to respond to any comments or questions you raise and where appropriate to undertake investigations into any complaints or concerns. On occasion, we may contact you to seek your views on the services we provide.

- **Holding emergency contact information**

When you join Kingston Trampoline Academy, we collect contact details. We also ask you to provide an emergency contact, which we will only use in exceptional circumstances if we are unable to contact your primary contact e.g. a parent.

- **Maintaining attendance registers, achievement records and waiting lists**

For health and safety purposes and our records, we need to maintain a register of those in attendance at training or other activities.

We will use your personal information to keep achievement records to show mastery of skills and record these for business purposes in the event that there is a change to our coaching staff and to be able to provide you with the ability to view your or your child's progress online. We will also use this information to show our insurers that a participant had mastered a particular skill in the event that an accident occurs.

If there are no membership places available, we can place you on our waiting list and will contact you using the details you provide to inform you when a place is available.

- **Entering you into a competition and providing results**

If you wish to take part in a competition, your information (usually your name, date of birth and gender) will be used to enter you into the appropriate category and your score will be recorded. Results of competitions are normally published on the British Gymnastics website and our website.

If you wish to enter a competition organised by another gymnastics body, including British Gymnastics, we will provide your information to the organiser to enable you to take part in the competition or event that they are organising.

- **Collecting additional information to support a participant attending a trip**

Occasionally we organise residential events or trips. If you or your child registers for one of these events, we will need to collect additional information that may vary dependent on the specific activities and whether they involve meals and travel. Additional information we require may include passport information and any other relevant information necessary to provide support whilst away from home.

- **Monitoring performance and undertaking fitness assessments**

If you or your child are/is a competitive gymnast, we will need to collect additional information about you/them. We track and monitor gymnast's performance in training, trials and competition and undertake regular fitness assessments. We may require additional information about lifestyle and education if you or your child are/is training at an elite level and requires time out of school or lifestyle.

o **Filming for coaching purposes**

We film gymnasts e.g. during a gymnastics session for coaching purposes. Videos taken at training sessions for individual coaching purposes are uploaded to your personal account owned and operated by Dartfish Inc. We will not use the videos for any other purpose not set out in this privacy policy without your prior consent.

o **Running, monitoring, security and performance of our website and social media**

We will monitor how our website is used by tracking the articles that you open and how you move around the site. This will help us to understand what information is most useful and helps improve the website.

We use a third party service, Google Analytics, to help us with this and to collect standard internet log information and details of visitor behaviour patterns. This information is only processed in a way that does not identify anyone.

You can read more about how we use cookies on our website in the section below entitled '**Cookies**'.

We use a third party web application firewall from Defiant, Inc to help maintain the security and performance of our website. The service checks if there is any suspicious file inserted or any suspicious changes. We rely on Defiant, Inc being GDPR compliant and/or on the EU-US Privacy Shield to transfer information to Defiant, Inc.

o **Using CCTV for security and crime detection/prevention**

We do not currently use CCTV ourselves, but the locations at which our gymnastic activities are provided to you do use CCTV for security and crime detection/prevention purposes.

The owners of those locations may therefore collect personal information about you and such information will be held in accordance with the owners of those locations privacy policies.

The locations that we currently use are set out in the table below, together with the period during which they retain CCTV images:

Location	Retention period
Arena Sports Hall	30 days
Kingston College	

Kingston Surrey KT1 2AQ	
The Holy Cross School New Malden Surrey KT3 5AR	130 days

With the exception of the CCTVs, which do not belong to us, you have the right to object to any of the above uses of your information by contacting us. Please note that in some cases, this may affect our ability to carry out the things we need to do for you to take part in gymnastics.

- **Consent**

We rely on consent in the following circumstances:

- To process any special category personal information that you may provide to us; and
- To take photographs and videos at events or training sessions for publication for promotional purposes.

When you have given us your consent for your personal information to be used for a particular purpose, you have the right to withdraw this consent at any time, which you may do by contacting us using the contact details below (see '**How to contact us**').

If you provided (any) consent(s) for a specific purpose as part of the information provided on our behalf through the British Gymnastics membership platform, this (these) consents can be withdrawn at any time by logging into your British Gymnastics account. Your withdrawal of consent will not affect any use of the personal information that was made before you withdrew your consent.

Special categories of personal information

We will only process this type of information if one of the following applies:

- you have given your explicit consent or have made this information public;
- we are required to do so to establish, exercise or defend a legal claim;
- we are required to do so to comply with employment or social security or social protection law;
- there is a substantial public interest in doing so; or
- it is in your vital interests and you are unable to provide consent e.g. if you are unconscious or do not have sufficient mental capacity.

Promotional communications

We may use your personal information to send you updates (by email, text message, telephone or post) about our products or services, including exclusive offers, promotions or new products or services.

We have a legitimate interest in processing your personal information for promotional purposes. This means we do not usually need your consent to send you promotional communications. However, where consent is needed, we will ask for this consent separately and clearly.

We will always treat your personal information with the utmost respect and never sell it for marketing purposes.

You have the right to opt out of receiving promotional communications at any time by:

- contacting us (see '**How to contact us**' below);
- using the 'unsubscribe' link in emails or 'STOP' number in texts; or
- updating your marketing preferences on the customer portal.

We may ask you to confirm or update your marketing preferences if you instruct us to provide further products or services in future, or if there are changes in the law, regulation or the structure of our business.

How long your personal information will be kept

We will keep your personal information while you have an account with us or we are providing products or services to you. Thereafter, we will keep your personal information for as long as is necessary:

- To respond to any questions, complaints or claims made by you or on your behalf;
- To show that we treated you fairly;
- To keep records required by law.

We will not retain your personal information for longer than necessary for the purposes set out in this policy.

Where your personal information will be kept

Information may be held at our offices and those of third party agencies, service providers, representatives and agents as described below (see below: '**Who we share your personal information with**').

Some of these third parties may be based outside of the European Economic Area. For more information, including how we safeguard your personal information when this occurs, see below: '**Transferring of your personal information out of the EEA**'.

Who we share your personal information with

We may share your personal information with:

- **Government bodies or departments**

We may be required to share your information with bodies such as Her Majesty's Revenue and Customs (HMRC), the Health & Safety Executive (HSE), Police and the Information Commissioner's Office (ICO).

We may also share information with other organisations to safeguard children. Any information that is shared will be strictly limited to what is required to ensure children are protected from harm and will be carried out in accordance with the law and relevant government guidance.

- **British Gymnastics**

We may need to share your information with British Gymnastics if you want to participate in an event or if you suffer an injury or incident that we need to report to them.

- **Third party service providers**

We use third party service providers to help deliver certain activities on our behalf, such as registering you as a member, processing credit card payments, providing you with an online chat facility, sending you emails, reporting accidents or seeking your feedback on your experience with us. We may share your personal information with such third party service providers to the extent necessary for the sole purpose of enabling them to perform services on our behalf.

Here are examples of third party service providers that we use:

- **Registration:** – iClassPro is used to assist us in collecting the information we need to register you as a member of Kingston Trampoline Academy and to provide our services to you. The parent portal that you access via our website is actually owned and operated by iClassPro and when you provide your personal information via the parent portal you will be providing it to iClassPro who will share it with us. You will need to agree to iClassPro's privacy policy, which is available [here](#) and other policies and terms of use before providing your personal information
- **Online chat:** LiveChat is used to enable you to talk to us easily via our website when we are not coaching. When you use this facility on our website you will be providing your personal information to LiveChat, Inc in accordance with its privacy policy, which is available [here](#)
- **Video analysis:** Dartfish is used to capture, analyse and publish videos to your online video library. We will provide your name and email address to Dartfish so you can set up your own account with them and your account will be subject to Dartfish Inc's privacy policy, which is available [here](#)
- **Emails:** Gmail and MailChimp is used to assist us with emailing you with information. Gmail's privacy policy is available [here](#) and MailChimp's privacy policy is available [here](#)

- **E-signing of documents:** Adobe is used to enable us to send you documents electronically to sign. We will need to provide your email address to Adobe for this purpose. Adobe's privacy policy is available [here](#)
- **Feedback:** Qualtrics is research and experience software that we use to capture feedback from you. We will need to provide your email address with Qualtrics to enable the service. Qualtrics privacy statement is available [here](#)
- **Accident reporting:** Jolt is software that we use to process accident reports. When an accident report is created your details are completed on the Jolt application and stored with Jolt. The report is then emailed to relevant people to re-stock first aid kits and to review safety practices. Jolt's privacy policy is available [here](#)

We only allow our service providers to handle your personal data if we are satisfied they take appropriate measures to protect your personal data and we have data processing agreements in place with them.

- **Other disclosures**

We may also disclose and exchange personal information about you to others as we believe necessary or appropriate:

- to comply with legal requirements and for the administration of justice
- to comply with regulatory obligations
- to obtain legal or professional advice
- to enforce any of our terms and conditions or policies
- to protect our operations
- to protect our rights, privacy, safety or property, or yours or others; or
- to permit us to pursue available remedies or limit the damages that we may sustain
- to obtain insurance
- to obtain banking facilities or maintain our existing banking facilities

- **Mergers and acquisitions**

We may also need to share personal information with other parties, such as potential buyers of some or all of our business or during a re-structuring or re-organisation of our business.

Except for the above, we will only share your information with other third parties with your prior consent.

Transferring of your personal information out of the EEA

To deliver services to you, it is sometimes necessary for us to share your personal information outside of the European Economic Area (EEA), e.g.:

- with our service providers located outside the EEA; or
- if you are based outside the EEA.

These transfers are subject to special rules under European and UK data protection law.

Examples of some circumstances in which we may transfer your personal information to countries which are located outside of the EEA are as follows:

- To the United States in order to provide an online registration service and customer portal. This service is provided to us via iClassPro, Inc who are certified as adhering to the EU-US Privacy Shield. For more information, please see iClassPro's privacy policy which is available [here](#)
- To the United States in order to provide an online chat facility. This service is provided to us via LiveChat, Inc who are certified as adhering to the EU-US Privacy Shield. For more information, please see LiveChat Inc's privacy policy which is available [here](#)
- To the United States or another country outside of the EEA in order to send emails. We use Gmail for sending and receiving emails and this service is provided by Google LLC. Google maintain servers around the world and your information may be processed outside of the EEA when we use this service. Google comply with the EU-US Privacy Shield Framework. For more information, please see Google's privacy policy which is available [here](#)
- To the United States in order to send emails. This service is provided by MailChimp (a trademark of The Rocket Science Group) who are certified as adhering to the EU-US Privacy Shield. For more information, please see MailChimp's privacy policy which is available [here](#)

If you would like further information, please contact us (see '**How to contact us**' below).

Cookies

A cookie is a small text file which is placed onto your device (e.g. computer, smartphone or other electronic device) when you use our website. We use cookies on our website. These help us recognise you and your device and store some information about your preferences or past actions.

For further information on our use of cookies, please see our Cookie policy [here](#).

For further information on cookies generally visit www.aboutcookies.org or www.allaboutcookies.org.

Your rights

You have the following rights, which you can exercise free of charge:

Access	The right to be provided with a copy of your personal information (the right of access)
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Rectification	The right to require us to correct any mistakes in your personal information
To be forgotten	The right to require us to delete your personal information—in certain situations
Restriction of processing	The right to require us to restrict processing of your personal information—in certain circumstances, e.g. if you contest the accuracy of the data
Data portability	The right to receive the personal information you provided to us, in a structured, commonly used and machine-readable format and/or transmit that data to a third party—in certain situations
To object	The right to object: —at any time to your personal information being processed for direct marketing (including profiling); —in certain other situations to our continued processing of your personal information, e.g. processing carried out for the purpose of our legitimate interests
Not to be subject to automated individual decision-making	The right not to be subject to a decision based solely on automated processing (including profiling) that produces legal effects concerning you or similarly significantly affects you

For further information on each of those rights, including the circumstances in which they apply, see the Guidance from the UK Information Commissioner's Office (ICO) on individuals' rights under the General Data Protection Regulation.

If you would like to exercise any of those rights, please:

- email, call or write to us – see below: '**How to contact us**',
- let us have enough information to identify you,
- let us have proof of your identity and address (a copy of your driving licence or passport and a recent utility bill), and
- let us know the information to which your request relates.

Keeping your personal information secure

We have appropriate security measures in place to prevent personal information from being accidentally lost, or used or accessed in an unauthorised way. We limit access to your personal information to those who have a genuine business need to

know it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

If you want detailed information from Get Safe Online on how to protect your information and your computers and devices against fraud, identity theft, viruses and many other online problems, please visit www.getsafeonline.org. Get Safe Online is supported by HM Government and leading businesses.

How to complain

We hope that we can resolve any query or concern you raise about our use of your information.

The General Data Protection Regulation also gives you right to lodge a complaint with a supervisory authority, in particular in the European Union (or European Economic Area) state where you work, normally live or where any alleged infringement of data protection laws occurred. The supervisory authority in the UK is the Information Commissioner who may be contacted at <https://ico.org.uk/concerns/> or telephone: 0303 123 1113.

Changes to this privacy policy

This privacy policy was published on 22/11/2018.

We may change this privacy policy from time to time, when we do we will inform you via email.

Please note that if iClassPro changes the terms of its privacy policy in relation to the customer portal facility, you may be required to agree to their changes when you next log onto the customer portal.

How to contact us

Please contact us if you have any questions about this privacy policy or the information we hold about you.

If you wish to contact us, please send an email to info@kingstontrampoline.co.uk, write to Image House Unit 8, 326 Molesey Road, Walton-On-Thames, England, KT12 3PD or call 020 8941 7083.