



## GDPR - DATA PROTECTION POLICY

This policy sets out how Clubzone CZ Limited use their customer data and how they protect and use it when receiving information.

As a company, we will hold data electronically and in manual formats and maintain our high standards by following these 8 data protection principles;

- Fairly and lawfully processed
- Processed for specified purposes
- Adequate, relevant and not excessive
- Accurate and, where necessary, kept up to date
- Not kept for longer than necessary
- Processed in line with the rights of the individual
- Kept secure
- Not transferred to countries outside the European Economic Area unless the information is adequately protected

### ***Why we need and use customer data***

Clubzone will need to obtain your data for the following reasons;

- Customer communications with services they purchase
- Emergency contact information when their children are present at our clubs
- To receive offers and promotions related to the clubs they have interest in using

### ***How we store your online information***

- Information will be stored on our full secure website when registering online
- [www.clubzone.co.uk](http://www.clubzone.co.uk) is secure with their SSL certificate stated a safe and secure connection
- Card payments are processed and protected by Stripe - Stripe has been audited by a PCI-certified auditor and is certified to [PCI Service Provider Level 1](https://stripe.com/docs/security/stripe).  
<https://stripe.com/docs/security/stripe>

### ***How we keep and record manual data for our clubs***

- Customers will be asked to fill out a consent form for all our holiday clubs they attend
- These records will be kept in a folder and locked away in the building of the club
- These forms will be kept for the duration of the calendar year and then destroyed by January 31<sup>st</sup> the following year

### ***Who can access the data?***

- Full time Clubzone staff (Online Data and Manuel folders)
- Site Supervisors and Activity leaders working on the clubs (Manuel folders)

**Online data** will be used for communications regarding bookings, cancellations, club changes, specific information relating to the service chosen and promotions if the customer has chosen to receive.

**Manuel Folders** will be used for the clubs when in operation and can be accessed by the Clubzone team that on site in case of emergencies of they need to speak with the parent/guardian whilst their child is in the care of Clubzone.

### ***Holiday Club Mobile Phones***

At each holiday club venue, we have a mobile phone which the parents/guardians can note down in case they need to reach the team during the day. This also prevents staff members from using their personal phones to contact and store your data.

All data from the Clubzone mobile phone will be deleted at the end of the week so no data is stored.

### ***Main Contact Telephones***

Our main contact numbers **07505 406226** and **07932 045634** will be used for business purposes only. These mobile numbers will be used for phone calls and text messages regarding bookings made by our customers relating to the club or service they have paid for.

These telephones are password protected and can only be accessed by the office team and the DPO.

All data received on these phones will be discarded once communication is no longer needed. Customers booking their child via text message will then be added to the online register and be asked to fill a consent form out on the day of arrival of the club.

### ***Business Box***

Our landline number **0116 2795099** is based at the Business Box, Leicester, LE3 1HR and is organized by the Business Box office team who are responsible for receiving messages and forwarding them to the Clubzone office team. Phone calls made to this number will be asked for permission to take down a message and emailed to Marc Sherlock who will then return the call at a more suitable time.

Alternatively, you will be asked to call one of the mobile numbers and speak to the team directly.

### **How long we keep your data**

- Manuel Folders will be kept for the duration of the calendar year and then all consent forms will be destroyed by January 31<sup>st</sup> the following year.
- Injuries and Behavior forms will be kept for a minimum of 2 years.
- Online Data will be kept until the customer informs us that their child is too old for the clubs or just wants their data removed.

### **How your data is used from time of booking to club ending**

- Online bookings will automatically add your children to our registers
- Excel sheet is then created which will contain a phone number and email address in case of communication is needed
- Signing In/Out sheets and registers will be printed and added to the manual folders
- Manuel folders may include consent forms given on previous clubs that year
- Folders are collected from the Clubszone team and taken to the club venues
- Folders are locked away overnight at the venue until the next day
- Once the club has finished the folders are then returned to the Clubszone team
- Folders are then locked away at the main office safe and secure until next the next club

### ***Marketing and Promotions***

Online customers can opt out of receiving emails and texts regarding future clubs and dates related to their previous service purchased from Clubszone in their online account.

Clubszone will ask for permission when registering a new account or by a manual consent form when using the clubs.

The team will always make sure they have permission to send this kind of information before doing so.

### ***Third Party communications***

Clubszone will NOT use their customer information to send to other companies. The sole purpose for our customers data is for their own services and promotions relating to their clubs. Clubszone do use Trustpilot which is a review company that allows OUR customers to leave feedback regarding our services.

## **Trustpilot**

Clubszone use Trustpilot to allow their customers to read and leave reviews about their experience with us. This can be a great way for new parents and guardians to have reassurance before sending their child for the first time.

Clubszone will use the email address that you have given to use to then send an invitation on our behalf to you asking to leave us a review after you have purchased a service from time to time.

Here is a link below stating the relationship we have with them;

<https://support.trustpilot.com/hc/en-us/articles/360000721308--Our-security-practices>

## **ICO Registration**

Clubszone have done their self-assessment on the ICO website and our result was that we are exempt and are under no requirement to register.

## **Clubszone Data Protection Officer**

If you need to get in touch with anything regarding data that Clubszone handles, our designated person is Marc Sherlock and his details are [marc@clubszone.co.uk](mailto:marc@clubszone.co.uk) or 0116 2795099 / 07505406226.

We will always strive to communicate as soon as possible but please allow up to 30 days in the case of delay.

## **How to request data to be released**

Get in touch with the Clubszone DPO as stated above and ask for your data to be permanently deleted. This will result in all information being removed and your Clubszone account removed.