

# PRIVACY NOTICE – ACTIVE HOUSE LIMITED

Revised: 25.10.2019

## 1. Scope

This document provides you with information about how we are handling, or are intending to handle, your personal information.

If you are aged 16 or under you must seek your parent or guardian's permission before you provide any personal information to us.

## 2. About us

Active House Limited, trading as Active House Solutions, is committed to protecting and respecting your privacy and complying with the principles of applicable data protection laws in the territories that we operate within. This notice sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. You should read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

The data controller of the personal data referred to in this policy is Active House Limited, whose registered office is: Bentley's, Suite 6, 141/143 South Road, Haywards Heath, West Sussex, RH16 4LZ.

Active House Limited also manages other programmes and activities on behalf of our clients. Any data we collect and/or process in the course of that work is also subject to this Privacy Notice & Policy. Those programmes/activities include:

- Mid Sussex Active
- 'Well Balanced', on behalf of Mid Sussex Wellbeing and referring Health Care Professionals and/or support staff
- 'Mid Sussex Marathon', on behalf of Places for People Leisure and Mid Sussex District Council

## 3. Collection of personal data

Active House Limited may collect and/or create or otherwise obtain and process the following data about you:

- Information about you that you provide by filling in forms while registering for activities and/or making purchases on our websites
- Information about you from third parties where you are a patient of said party and have consented that your personal information can be shared with us, for us to help facilitate your care.

Active House Limited websites:

- [Activehousesolutions.co.uk](http://Activehousesolutions.co.uk)
- [Midsussexmarathon.co.uk](http://Midsussexmarathon.co.uk)

This includes information provided at the time of registering to use our websites, becoming a participant or volunteer at the Mid Sussex Marathon, being referred to us as part of the Well Balanced falls prevention programme, subscribing to our communications, posting material, booking onto, entering, attending and/or volunteering at events or activities we manage or requesting further services.

- Information from your social media accounts but only where you have given us permission to use it. For example, posts, pictures and video footage you share on sites such as Facebook and Twitter.
- We may also ask you for information when you report a problem or make a complaint and, if you contact us, we may keep a record of that correspondence.

- We may also ask you to complete optional surveys that we use for research purposes and to provide you with a more relevant customer experience.
- Details of when you digitally interact with Active House Limited via our websites and other digital channels and the resources that you access which may include the use of cookies (subject to our Cookie policy).
- Information about emails and other communications we have sent to you and your interaction with them.
- Information from third parties where you consent to those other organisations sharing information, they hold on you with us, and where those other organisations lawfully share your information with us.

#### **4. Uses made of your information and the basis of processing**

Active House Limited will use your personal information to:

- Ensure that content from our websites is presented in the most effective manner;
- Authenticate you when you register;
- Carry out our obligations arising from any contracts entered into between you and Active House Limited;
- Provide you with information, products or services that you request from Active House Limited or which we feel may interest you, where we are legally entitled to do so;
- Enable people to join events, activities and groups and communicate with each other via systems we provide as part of that activity;
- Allow you to participate in interactive features of Active House Limited's service, when you choose to do so;
- Notify you about changes to our service;
- To gather statistics about memberships and people interested in our events and activities; or
- To segment your personal data to make sure that you only receive information that is relevant to you. For example, if you are based in Cardiff, to make sure that you do not receive information about events in Glasgow.
- Publish and maintain a comprehensive set of results and rankings for the events and activities we provide where it is appropriate to do so

Active House Limited will not use any of the personal information we collect from you to make automated business decisions.

The legal basis on which we collect and process the personal data described above depends on the personal information concerned and the specific context in which we collect it. However, we will only use your personal information where we:

- Have your consent to do so;
- Need the personal data to form and fulfil a contracted product or service with you;
- Need to process your personal information for our legitimate interests and only where our legitimate interests are not overridden by your data protection interests or fundamental rights and freedoms;
- Have a legal obligation to collect personal information from you; or
- Need the personal information to protect your vital interests or those of another person.

If we ask you to provide personal information to comply with a legal requirement or to perform a contract with you, we will make this clear at the relevant time, and advise you whether the provision of your personal information is mandatory or not (as well as the possible consequences if you do not provide your personal information).

#### **5. Information security**

Active House Limited will take all steps reasonably necessary including policies, procedures and security features to ensure that your data is treated securely and protected from unauthorised and unlawful access

and/or use, and in accordance with this notice. Unfortunately, the transmission of information via the internet is not completely secure and, although we will do our best to protect your personal data transmitted to us via the internet, we cannot guarantee the security of your data transmitted to our website from your device. Any transmission is at your own risk.

Where we have given you (or where you have chosen) a password which enables you to access certain parts of the website, you are responsible for keeping this password confidential. We ask you not to share such a password with anyone.

Where any payments are being collected on our behalf, we require our payment providers to be compliant with the Payment Card Industry's Data Security standards (PCI-DSS).

## 6. Recipients of personal data

We will share information about you with some of our suppliers who process data on our behalf to help us to provide services to you. We undertake this data sharing on the basis of our legitimate interests.

Categories of organisation and purpose

- **Marketing agencies** - to provide relevant digital content to our customers
- **Database hosting companies** - to host Active House Limited digital platforms (e.g. the Mid Sussex Marathon website) and associated customer databases to enable customers to log in and interact with the website
- **Email broadcasting companies** - to send emails to our customers
- **SMS broadcasting companies** - to send SMS and text messages to our customers
- **Mailing houses** - To send products and benefits to our customers that are not directly produced by ourselves (e.g. publications)
- **Market research companies** - to undertake research of our own customers
- **Social media companies (e.g. Facebook/Twitter)** - to verify your identify when you register on our web site using 'register with' functions and to provide you with relevant social media posts
- **Online learning hosting companies** - to enable our customers to take part in online training and learning
- **Governing bodies of sports and activities in which we are operating** - to assist in event management, disciplinary issues and maintenance of competition licences (Run Britain and other federations)
- **Active House Limited registered event organisers, event/activity leaders and officials** - to enable event organisers, event/activity leaders and officials to manage Active House Limited registered activities and communicate with participants and appointed volunteers.
- **Sports results agencies** - to collate results and reports for the Active House Limited website on behalf of Active House Limited
- **Healthcare providers and agencies** who referred you to us for participation in Falls Prevention or other health & wellbeing activities where we are required to keep them informed of your participation, progress and wellbeing

## 7. International transfer of personal data

We do not envisage transferring any information about or relating to individuals to anyone who is located outside of the European Economic Area.

However, on some occasions, the information we collect may be transferred to organisations who may store and use such data at premises in other countries. Examples of this may be use of EventBrite or other online booking and reservation services for our events. Where we allow an organisation to process your personal information outside of the European Economic Area, we will ensure that we create and maintain appropriate safeguards with those organisations so that your personal information is subject to the same standards and protections as when we are processing your personal information inside the European Economic Area.

If you choose to sign-up with Facebook/Twitter when you register on our website were we to provide that option to you, Active House Limited may access your personal data in your Facebook/Twitter account,

depending on your settings, and we may post information submitted on our websites to Facebook/Twitter who will store such information in the United States. The EU has not endorsed the privacy laws of the United States but has approved a framework for the transfer of personal data called the EU:US Privacy Shield under which Facebook/Twitter has a valid certificate enabling us to lawfully transfer your personal data to Facebook. You may review [Facebook/Twitter's Privacy Shield certificate here](#).

## 8. Data retention period

We will hold information about you in our data systems only for as long as we need it for the purpose for which we collected it, which is as follows:

- As long as you continue to log into our website or use our services (including engaging with emails, entering events and/or participating in activities, making purchases, entering prize draws or downloading content) we will retain and process information about you. In such cases, you will be an 'active' customer. If you have not been 'active' as a customer for a period of three years, Active House Limited will deactivate your customer account and anonymise any personal data relating to you.
- Any data relating to the obligations of Active House Limited to maintain a comprehensive, published index of results in the course of our work with National Governing Bodies for sports will be retained. This would not include more than name, age category and gender alongside details of the event in which an individual took part.
- Any data we are required to hold in the course of our management of Falls Prevention or other health & wellbeing activities/programmes for which you have been referred to us will be retained for the period deemed appropriate by the authorised referring agency, and, will be securely destroyed in accordance with that agencies guidance at such time as they instruct us to do so or where we are required to do so under the applicable data protection legislation
- Personal data linked to the processing of insurance claims, subject access requests, disputes, safeguarding investigations, disciplinary or police matters will only be kept for as long as it necessary for those purposes, as each is applicable.

## 9. IP addresses and cookies

We may collect information about your computer, including where available your IP address, operating system and browser type, for system administration and to report aggregate information to our advertisers. This is statistical data about our users' browsing actions and patterns and does not identify any individual.

Please refer to our cookie policy to find out more information. Our cookie policy can be found on our websites.

## 10. The data subject's rights

Data protection laws grant you, as a Data Subject, certain 'information rights', which are summarised below:

- **Right of access** - You have the right to obtain a copy of information we hold about you
- **Right of rectification or erasure** - If you feel that any data that we hold about you is inaccurate, you have the right to ask us to correct or rectify it. You also have a right to ask us to erase information about you where you can demonstrate that the data we hold is no longer needed by us, or if you withdraw the consent upon which our processing is based, or if you feel that we are unlawfully processing your data. Please note that we may be entitled to retain your personal data despite your request, for example if we are under a separate legal obligation to retain it. Your right of rectification and erasure extends to anyone we have disclosed your personal information to and we will take all reasonable steps to inform those with whom we have shared their data about your request for erasure.
- **Right to restriction of processing** - You have a right to request that we refrain from processing your data where you contest its accuracy, or the processing is unlawful and you have opposed its

erasure, or where we do not need to hold your data any longer but you need us to in order to establish, exercise or defend any legal claims, or we are in dispute about the legality of our processing your personal data.

- **Right to Portability** - You have a right to receive any personal data that you have provided to us in order to transfer it onto another data controller where the processing is based on consent and is carried out by automated means. This is called a data portability request.
- **Right to Object** - You have a right to object to our processing your personal data where the basis of the processing is our legitimate interests including but not limited to direct marketing and profiling.
- **Right to Withdraw Consent** - You have the right to withdraw your consent for the processing of your personal data where the processing is based on consent.
- **Right of Complaint** - You also have the right to lodge a complaint about any aspect of how we are handling your data with the *UK Information Commissioner's Office*, which can be contacted at [www.ico.org.uk](http://www.ico.org.uk).
- **Right to Opt-out of Marketing Communications** - You have the right to opt-out of marketing communications we send to you at any time. You can exercise this right by clicking on the "unsubscribe" or "opt-out" link in the marketing emails we send you. To opt out of other forms of marketing (such as postal marketing or telemarketing), then please contact us using the contact details provided below.

## 11. Changes to our privacy policy

Any changes we may make to our Privacy Notice in the future will be posted on this page and, where appropriate, notified to you by date-stamped communication.

### How to contact us

If you wish to contact us about your personal data or exercise any of the rights described above please contact: [compliance@activehousesolutions.co.uk](mailto:compliance@activehousesolutions.co.uk)

Legal and Compliance, Active House Limited, Bentley's, Suite 6, 141/143 South Road, Haywards Heath, West Sussex, RH16 4LZ.