

• Key Contact Details

Address: Causeway Coast & Glens Borough Council, Cloonavin, 66 Portstewart Road, Coleraine, BT52 1EY

Phone: +44 (0) 28 7037034

Email: info@causewaycoastandglens.gov.uk

Date Protection Officer Contact: dpo@causewaycoastandglens.gov.uk

• How we Collect Data

We collect personal information about you in several ways when you interact with our Sport and Wellbeing services.

In-Person Sign-Ups

When you register for services at one of our leisure facilities, we collect information directly from you. This may include:

- registration and membership forms
- health or fitness declarations (where relevant for safety)
 - Health information (e.g. PAR-Q/PAR-S) is treated as special category data and is processed only where necessary for health and safety purposes.
- payment and contact details

Phone and Email Enquiries

If you contact us by phone or email, we may collect:

- your contact details
- details of your enquiry or request
- any other information you choose to provide
- payment details

This information is used to respond to your enquiry and manage our services.

Online Services (Xplor Legend)

When you use our online booking and membership system, provided by Xplor Legend Leisure Management Systems, we collect information you provide when:

- creating or managing an account
- booking activities or classes
- purchasing memberships or services

- making payments

This may include your contact details, booking history and transaction information.

Here is a link to Xplor Legend's Privacy Policy: <https://xplor.com/privacy-notice/>

CCG Leisure Mobile App

When you use the CCG Leisure mobile app, we collect information necessary to provide services and improve your experience. This may include:

- account and login details
- booking and activity information
- app usage data (such as how you interact with features)

You can manage certain data collection, such as notifications, through your device or app settings.

Here is a link to the app providers (MyFitApp) privacy policy: <https://www.myfitapp.com/privacy/>

Surveys

We may collect information when you complete surveys or provide feedback on our services.

Participation is usually voluntary, and the information you provide helps us to:

- improve our facilities and services
- understand customer needs and experiences

We only collect information necessary to deliver and improve our services. We ensure it is handled in accordance with data protection rules.

• Type of data collected

Personal Details

- Name, Address, DOB, Email address, phone number

Membership and Account Information

- Membership details
- Account information associated with our booking systems

Booking and Attendance information

- Details of activities, classes and services you book
- Attendance information required to process payments

This information is processed through our leisure management system (Xplor Legend Leisure Management Systems)

Payment Information

- Payment records and transaction history
- Billing information required to process payments

Please note that payment details are processed securely by our payment providers (DFC – Debit Finance Collections – Xplor/Legend) and are not stored directly by the council.

<https://xplor.com/privacy-notice/>

App Usage Data

Our CCG Leisure mobile app is provided by MyFitApp.

Through our app we may collect information such as:

- Account and login details
- Booking and activity information accessed via the app
- App usage data (e.g. how features are used)

MyFitApp includes functionality that can integrate with Google Health Connect on Android devices to support health and fitness tracking.

Where this feature is enabled by a user, it may access limited workout-related data, including:

- activity type (e.g. running, cycling)
- duration, distance, and start/end time
- calories burned and step count
- activity summaries

If enabled, this data would only be used within the app to support user-initiated fitness features, such as:

- tracking activity and progress
- participating in fitness challenges

Any data is obtained from Google Health Connect and may include information synced from third-party apps or wearable devices. Users can manage or revoke permissions at any time through their device settings.

This feature does not access sensitive health data such as heart rate, sleep data, body measurements or medical information.

Causeway Coast and Glens Borough Council does not access, use or process this data and does not use it for advertising, profiling, analytics, research, or sharing with third parties.

Causeway Coast & Glens Borough Council DOES NOT currently use or enable this functionality as part of its Sport and Wellbeing services.

You can find their privacy policy here: <https://www.myfitapp.com/privacy/>

CCTV

CCTV is in operation at our leisure facilities for the purposes of:

- public safety
- crime prevention and detection
- protection for staff and other customers

Images may be recorded and retained in line with the Council's [overarching policy](#) relating to CCTV.

• **How and why we use your information**

We use your information to deliver and manage our Sport and Wellbeing services. This includes:

- **Managing memberships**

To create and maintain your membership account, verify eligibility and manage your relationship with our services.

- **Processing bookings**

To allow you to book and attend activities, classes/facilities and manage scheduling and availability.

- **Delivering activities and services**

In order to provide access to our leisure facilities, programmes/services and to ensure they are delivered safely and effectively.

- **Customer Communication**

To contact you with important service-related information such as:

- Booking confirmations
- Cancellations
- Changes to service
- Responses to enquiry

- **Service Improvement**

To review and improve our services, facilities and customer experience including through feedback and usage data.

- **Marketing & Communications**

To send information about our services including classes, programmes and offers that are relevant to you. Where you have used our services, we may contact you under a "soft opt-in" basis, meaning we will only send information related to services you have previously accessed or shown an interest in. You can opt out of these communications at any time.

- **Lawful Basis for Processing**

We process your personal data under the following lawful bases:

- **Public Task** - to deliver leisure and wellbeing services as part of the Council's functions
- **Contract** - where processing is necessary to provide memberships, bookings and services you have requested
- **Legal Obligation** - where we are required to process data to comply with the law

- **Consent** - for certain activities such as marketing where required

Where we process health-related information, we do so for reasons of health and safety and in accordance with relevant data protection legislation.

• **Systems and 3rd parties**

IT and Hosting Providers

We use IT and hosting providers to support the operation, security and storage of our systems and data. This may include:

- Online services and bookings
- Data storage and backups
- Health and Fitness data (Physical Activity Readiness Questionnaire)
 - <https://forms.ccgbcapps.com/forms/adult-parq>
 - <https://forms.ccgbcapps.com/forms/junior-parq>

Data is held within UK servers.

We use trusted 3rd party providers to deliver our Sport & Wellbeing services. These organisations process personal data on our behalf and are required to do so in accordance with data protection legislation.

We have appropriate **Data Processing Agreements (DPAs)** in place with Xplor Technologies/Legend to ensure information is handled securely and only for authorised purposes.

We use Xplor Technologies (Legend) to manage customer accounts, payments, bookings and provision of CCG Leisure App.

Further information is available in Xplor/Myfitapp policies:

<https://xplor.com/privacy-notice/>

<https://www.myfitapp.com/privacy/>

Data Protection and Security

3rd party providers identified in this document act as data processors on our behalf and are contractually required to:

- Only process data in line with our instructions
- Keep your information secure
- Comply with UK data protection legislation

We do not allow 3rd parties to use your personal data for their own purposes.

• Data Sharing

We do not sell your personal information, and we only share your data where necessary (in line with data protection laws).

We may share your data with:

Service Providers who support the delivery of our services and acting on our behalf. (Xplor Technologies/Legend, MyFitApp)

Emergency Services where required to protect health and safety

Law Enforcement or Regulatory Bodies where we are legally required to do so

We ensure that only the minimum necessary information is shared and appropriate safeguards and agreements are in place. We do not share any personal information for marketing purposes.

• Location of personal data

Personal data collected as part of our services is stored within our leisure management system, provided by Xplor Technologies (Legend). Data for Legend is hosted within the UK (Microsoft Azure UK South Region).

Physical Activity Readiness Questionnaire data is held by council on UK servers.

• Data Retention

We only keep your information as long as necessary to provide our services and to meet legal and regulatory requirements.

Active memberships - We retain data for as long as your membership is active

Inactive accounts – We retain your data for 15 months after your membership becomes inactive, after which it will be securely deleted or anonymised

• Marketing & Communications

We will contact you with information about our Sport & Wellbeing services including:

- Classes
- Programmes
- Membership updates
- Operational updates/information

How we contact you

We will contact you via email using such systems as Mailchimp, Mandrill and our leisure management system (Xplor/Legend). If you use our CCG leisure app we may also send you push notifications through the application.

Legal Basis

We will contact you under a soft opt-in basis. This means that we will only send you information that is relevant to services available and relevant to your membership. We will not send you unrelated marketing and you will be given the opportunity to opt out of these communications at any time.

Managing your preferences

You can opt out of marketing communications at any time by:

- Clicking the unsubscribe link in our emails
- Adjusting the app notification settings
- Contacting us directly to update your preferences

• Your data protection rights

Under data protection law, you have rights including:

Your right of access - You have the right to ask us for copies of your personal information.

Your right to rectification - You have the right to ask us to rectify personal information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.

Your right to erasure - You have the right to ask us to erase your personal information in certain circumstances.

Your right to restriction of processing - You have the right to ask us to restrict the processing of your personal information in certain circumstances.

Your right to object to processing - You have the right to object to the processing of your personal information in certain circumstances.

Your right to data portability - You have the right to ask that we transfer the personal information you gave us to another organisation, or to you, in certain circumstances.

You are not required to pay any charge for exercising your rights. If you make a request, we have one month to respond to you.

Please contact us if you wish to make a request (see 'Key Contact Details' details above).

• How to complain

If you have any concerns about our use of your personal information, you can make a complaint to Council's data protection officer using the details below:

Email: dpo@causewaycoastandglens.gov.uk

If you have any concerns we would ask you contact us first but you do however have the right to complain to the Information Commissioners Office (ICO).

You can contact them using the following details:

Email: casework@ico.org.uk / ni@ico.org.uk

NI Office

Phone: 0303 123 1114

Address: The information Commissioners Office – Northern Ireland, 10th floor, Causeway Tower, 9 James Street South, Belfast, BT2 8DN

Head Office

Phone: 0303 123 1113

Website: ico.org.uk

Address: Information Commissioners Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF