

Privacy Notice

Twist Gym is committed to protecting your privacy. This Privacy Notice explains our data processing practices and your options regarding the ways in which your data is used. If you have any requests concerning your personal information or any queries with regard to our processing please contact us at info@twistgym.co.uk.

1.0 Use of your information and your preferences

Twist Gym will only process (collect, store and use) the information you provide to us in a manner compatible with the EU's General Data Protection Regulation (GDPR). We are committed to ensuring that the information we collect and use is appropriate for the purposes listed below and does not constitute an invasion of your privacy. We are also committed to applying rigorous security measures when managing your data to minimise the risk of unauthorised access or disclosure

2.0 Consent

By taking out a membership, filling in a contact form on our website, or using a mobile app we provide to you, you agree and accept that we may gather, process, store and/or use the personal data submitted in accordance with the terms set below. If you are under the age of 16, Twist Gym will not collect or process your details unless we have also received the consent of an adult who has parental responsibility for you.

3.0 Personal Data Collected

3.1 Identity and contact details of the data processor

Personal data collected by us and stored via our website or mobile app is processed on our behalf by ClubWise Software Ltd, 6 Tower Court, Horns Lane, Princes Risborough, Bucks, HP27 0AJ Company Reg: 3843268. Your data is stored in the UK. From time to time it may be made visible to employees of ClubWise Development India Pvt. Ltd, Office No. 101, First Floor, Fourtune Arcade, Yeolekar Mala, College Road, Nashik – 422005, Maharashtra for the purposes of software support. The data processor and group companies belonging to it are required by us to process your data in strict compliance with the GDPR.

3.2 Purposes of processing and legal basis

The principal purpose of collecting your personal data is to provide you with the services defined in your membership agreement. To this end, you agree and accept that we may use your personal data to:

- Contact you in respect of your membership
- Manage your club access
- Facilitate member rewards (if applicable)
- Resolve any problems you may have and improve our service to you
- Comply with our legal and regulatory obligations

We use the personal data submitted to us only in accordance with the applicable data protection legislation. Our employees and third-party providers are under an obligation to respect your data privacy.

3.3 Marketing

If you consent, we may send you marketing information by e-mail or sms about products and services which we believe may be of interest to you. We will always provide the ability to review or change your preferences or unsubscribe from marketing information with immediate effect. You can also make your request via e-mail to info@twistgym.co.uk.

3.4 Data we collect

When you take out a membership with us, the following personal data may be collected and processed in accordance with the purpose and legal basis described above and may include: name, address, contact details (including e-mail and mobile phone number), gender, date of birth, attendance history, marketing preferences and bank details for billing. Some data is collected automatically through using our web site (see section 3.7 below)

Certain features of our mobile app may connect to your social networking sites to enable you to follow or be followed by other members of Twist Gym. As a result, Twist Gym may process information from your social networking profile, but only if you consent to allow your social networking site to make information available to the app. You understand that, by creating an account for the mobile app, Twist Gym will be able to identify you by your profile.

3.5 Obtaining or changing your details

Twist Gym can confirm to you the details of any personal data we hold about you and how it is processed on your request. You may also ask us to correct or delete personal information we hold about you at any time, so long as this information is not required in order to fulfil our service to you.

For more information, request your details or advise us of any changes, please either:

- Send an email to info@twistgym.co.uk or;
- Write to us at: The Chalk Pit

College Road, Epsom, KT17 4JA

We may require that your request be accompanied by a photocopy of proof of identity or authority, such as a driving license or passport. Mobile app users are able to maintain some of their personal data directly. Note that if your account is in arrears you will be unable to use this functionality and you will be directed to contact us accordingly.

3.6 Third party disclosures

Your information may be passed to and used by all Twist Gym companies. Your personal data is also passed to our data processor for the purpose of providing our services to you (see 3.1). Your data will not be shared with any other third-party service providers without obtaining your prior consent. Any third parties that we may share your data with are obliged to keep your details securely, and to use them only to fulfil the service they provide you on our behalf. When they no longer need your data to fulfil this service, they will dispose of your details in line with Twist Gym procedures.

We will never pass your personal information to anyone else, except where we are required or permitted to do so by law, for any successors in title to our business and suppliers that process information on our behalf both in the UK and abroad. We may also use and disclose information in aggregate (so that no individual customers are identified) for marketing and strategic development purposes.

3.7 Cookies

A cookie is a small amount of data, which often includes a unique identifier that is sent to your computer browser from a website's computer and is stored on your device's hard drive in the form of a text file.

3.7.1 How do Twist Gym use cookies?

Cookies are used to control an online session and provide security such as a time-out function. Twist Gym only issues session specific cookies which store no personal or transactional data.

3.7.2 Third Party Cookies: Google Analytics

Twist Gym may use Google Analytics for SEO purposes and to improve their online marketing efforts. For a detailed explanation of how Google Analytics cookies work please visit: <https://developers.google.com/analytics/resources/concepts/gaConceptsCookies>

3.8 Other web sites

Our web site may contain links to other web sites which are outside our control and are not covered by this Privacy Notice. If you access other sites using the links provided, the operators of these sites may collect information from you which will be used by them in accordance with their privacy notice, which may differ from ours.

4.0 Data Retention Period

As a prospective member that has consented for us to contact you, Twist Gym will retain your data for up to 12 months, unless you notify us that you no longer wish to be contacted. If you join us, Twist Gym will retain your data for as long as you are a member. On termination of your membership, your personal data will be stored for a maximum period of 6 years for the purposes of responding to you in the event of any future indemnity claim that may arise. After this period, your personal data will be anonymized so you can no longer be identified from the information we hold.

4.1 Your rights as a data subject

At any point while we are in possession of or processing your personal data, you, the data subject, have the following rights:

- a) Right to be informed – you have the right to know how your personal data is being used
- b) Right of access – you have the right to request a copy of the information that we hold about you.
- c) Right of rectification – you have a right to correct data that we hold about you that is inaccurate or incomplete.
- d) Right to be forgotten – in certain circumstances you can ask for the data we hold about you to be erased from our records.
- e) Right to restriction of processing – if you believe the basis for processing your data as described in section 3 of this notice no longer applies or if you contest the accuracy of the information we hold about you, you have a right to request restrictions to the processing of your data
- f) Right of portability – you have the right to have the data we hold about you transferred to another organisation.
- g) Right to object – you have the right to object to certain types of processing such as direct marketing.
- h) Right to object to automated processing, including profiling – you also have the right to not be subject to the legal effects of any automated processing or profiling.

Note that if Twist Gym refuses a request from you under rights of access, we will provide you with a reason as to why.

Finally, if a data breach occurs which compromises your personal data, you have a right to be informed within 72 hours of us first becoming aware of the breach.

5.0 The Right to Complain

If you believe that your data is being processed unfairly or you have any other concerns about the way that Twist Gym or its designated processor is handling your data, you have the right to complain to the Information Commissioners Office (ICO). Please visit www.ico.org.uk for more information.

6.0 Privacy Notice Changes

Twist Gym reserves the right to update this Privacy Notice at any time, in particular pursuant to any changes made to the laws and regulations in force. We would recommend that you check these rules from time to time to stay informed of our procedures and rules relating to your personal information.

7.0 Contact Us

If you have questions relating to this privacy notice, you can:

- Send an email to info@twistgym.co.uk or;
- Write to us at: The Chalk Pit

College Road, Epsom, KT17 4JA