

Privacy Policy for The Fighter Factory Muay Thai Academy

At **The Fighter Factory Muay Thai Academy**, we respect your privacy and are committed to protecting your personal data. This privacy policy outlines how we collect, use, and protect your personal information when you engage with our services or visit our website.

This privacy notice covers the following sections:

1. Important information and who we are
2. The data we collect about you
3. How your personal data is collected
4. How we use your personal data
5. Disclosures of your personal data
6. Data security
7. Data retention
8. Your legal rights
9. Contact details
10. Changes to this privacy policy

1. Important Information and Who We Are

Purpose of this Privacy Notice

It is important that you read this privacy notice. It provides information on how we collect and process your personal data when you use our services, make an enquiry, book a lesson, or sign up as a member. This privacy notice applies to all users of our services, including children, where relevant data is provided by a parent or legal guardian.

Controller

The Fighter Factory Muay Thai Academy is responsible for your personal data and acts as the controller. We have appointed a Data Privacy Manager who is responsible for overseeing questions regarding this privacy notice. If you have any questions about this privacy notice, or wish to exercise your legal rights, please contact the Data Privacy Manager using the details below.

Contact Details

Our contact details are as follows:

The Fighter Factory Muay Thai Academy - Data Privacy Manager Email:

thefighterfactory1@gmail.com Phone: 02393 553594

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk). However, we would appreciate the opportunity to address your concerns first, so please contact us.

Your Duty to Inform Us of Changes

It is important that the personal data we hold about you is accurate and up to date. Please keep us informed if your personal data changes during your relationship with us.

Third-Party Links

Our website may include links to third-party websites, plug-ins, and applications. Clicking on those links or enabling connections may allow third parties to collect or share your data. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

2. The Data We Collect About You

Personal data, or personal information, refers to any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store, and transfer different kinds of personal data about you, which we have grouped together as follows:

- **Identity Data:** Includes first name, last name, title, date of birth, and gender. This also applies to children enrolled in our classes, provided by parents or guardians.
- **Contact Data:** Includes billing address, email address, and telephone numbers.
- **Health Data:** Relevant health information necessary to ensure safe participation in martial arts training. This is typically collected with consent to ensure appropriate safeguards are in place during training.

- **Training Data:** Details about class attendance, progress, assessments, and gradings.
- **Financial Data:** Includes bank account details or payment card details.
- **Transaction Data:** Includes details about payments you make to us and details of services you have purchased.
- **Technical Data:** Includes internet protocol (IP) address, browser type and version, time zone setting and location, browser plug-in types and versions, operating system, platform, and other technology on devices used to access our website.
- **Profile Data:** Includes your username and password, purchases or orders made by you, and your interests and preferences.
- **Usage Data:** Information about how you use our website and services.
- **Marketing and Communication Data:** Includes your preferences for receiving marketing from us and your communication preferences.

We may also collect, use, and share **Aggregated Data** such as statistical or demographic data. Aggregated Data may be derived from your personal data but does not directly or indirectly reveal your identity. However, if we combine Aggregated Data with your personal data in a way that could identify you, we treat it as personal data in line with this privacy notice.

Special Categories of Personal Data

We may collect health-related data to ensure the safety and suitability of participants during training. We do not collect any other special categories of personal data, such as race or religious beliefs.

3. How We Collect Your Personal Data

We use various methods to collect data from and about you, including:

Direct Interactions:

You may provide personal data by filling out forms or corresponding with us by post, phone, email, or otherwise. This includes personal data provided when you:

- Register as a member or enrol your child in classes.
- Book a trial lesson or attend a class.
- Subscribe to our publications or request marketing materials.
- Make a payment or purchase services from us.
- Provide feedback or complete a survey.

Automated Technologies or Interactions:

As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions, and patterns. We collect this personal data using cookies, server logs, and other similar technologies. Please see our cookie policy for further details.

Third Parties or Publicly Available Sources:

We may receive personal data about you from third parties, including:

- **Technical Data** from analytics providers such as Google, and social media platforms like Facebook.
- **Contact, Financial, and Transaction Data** from providers of payment and delivery services.

Cookies:

Our website uses cookies to enhance the user experience and analyse website traffic. You can control your cookie preferences through your browser settings.

4. How We Use Your Personal Data

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- **To Register You as a Member:** When you sign up for a class or membership, we process your data to create an account and manage your membership.
- **To Process Payments:** We collect and process your financial data to manage payment for services and memberships.
- **To Provide You with Services:** This includes managing class bookings, tracking attendance, and monitoring your progress or that of your child during martial arts classes.
- **To Manage Our Relationship with You:** This includes notifying you of changes to our terms or privacy policy and asking you to leave a review or take part in a survey.
- **To Ensure Health and Safety:** Health data is used to ensure that students can safely participate in classes and to tailor training to individual needs.
- **To Improve Our Services:** Usage data and feedback allow us to improve our classes, services, and customer experience.

- **To Deliver Marketing Communications:** With your consent, we may send you information about new classes, promotions, and events that may be of interest to you.
- **To Administer and Protect Our Business:** This includes activities such as troubleshooting, data analysis, testing, system maintenance, and hosting data.
- **To Comply with Legal Obligations:** In some cases, we may be required to process your data for legal or regulatory purposes, such as for tax reporting.

Legal Basis for Processing

We rely on different legal bases depending on the specific purpose for which we process your data:

- **Performance of a contract:** This applies when we need to process your data to fulfil a contract, such as providing martial arts training services.
- **Legitimate interests:** We may process your data to pursue our legitimate interests in managing and growing our business, while making sure your rights are not overridden.
- **Consent:** We will seek your consent for certain marketing activities or for processing health-related data. You can withdraw consent at any time.

5. Disclosures of Your Personal Data

We may have to share your personal data with third parties for the purposes set out in section 4. We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes in accordance with our instructions.

The third parties we may share your data with include:

- **Service providers:** These include IT systems providers, payment processors, and marketing services providers who support our business and provide administrative and IT services.
- **Professional advisers:** We may share your data with lawyers, bankers, auditors, and insurers who provide consultancy, banking, legal, insurance, and accounting services.
- **Regulators and other authorities:** These include the Information Commissioner's Office (ICO), as well as HM Revenue & Customs and other regulatory authorities who may require reporting of processing activities in certain circumstances.
- **Third parties involved in a business transaction:** If we decide to sell or transfer parts of our business or assets, or if we merge with another business, we may share your personal data as part of that transaction.

We require all third parties to respect the confidentiality of your personal data and to only process it as required to provide their services to us.

6. International Transfers

We do not transfer your personal data outside the UK or the European Economic Area (EEA).

In cases where we may need to transfer data internationally, such as using service providers based outside the UK or EEA, we ensure that appropriate safeguards are in place. This may include:

- Using contracts that require the protection of personal data to the same standard as within the UK.
- Ensuring the service providers, we work with comply with UK GDPR and data protection standards.

If we do transfer your personal data outside the UK or EEA, you will be informed, and you will have the right to ask about the safeguards used to protect your data.

7. Data Security

We have implemented appropriate security measures to prevent your personal data from being accidentally lost, used, accessed, altered, or disclosed in an unauthorised way.

These measures include:

- **Access control:** Only employees, contractors, and third parties who have a legitimate business need are allowed access to your personal data. They are required to process your data only on our instructions and are subject to a duty of confidentiality.
- **Security protocols:** We use encryption, firewalls, and secure servers to protect the data we store electronically.
- **Regular reviews:** We regularly test and update our security measures to safeguard your data.
- **Breach response:** In the unlikely event of a data breach, we have procedures in place to deal with the breach and will notify you and any applicable regulator where we are legally required to do so.

While we strive to protect your personal data, please note that no method of transmission over the internet or method of electronic storage is 100% secure, and we cannot guarantee absolute security.

8. Data Retention

We will only retain your personal data for as long as necessary to fulfil the purposes for which we collected it, including to satisfy any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the following:

- The amount, nature, and sensitivity of the data.
- The potential risk of harm from unauthorised use or disclosure of the data.
- The purposes for which we process the data and whether we can achieve those purposes through other means.
- The legal requirements, such as those for tax purposes or financial reporting.

We retain different types of personal data for different periods:

- **Membership and contact data:** Retained for the duration of your membership and up to 7 years after your relationship with us ends to comply with legal obligations.
- **Financial data:** Retained for 7 years to meet accounting requirements.
- **Health and training data:** Retained for the duration of the membership and only as long as necessary to ensure safety in training.

In some cases, we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

9. Your Legal Rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data. These rights include:

- **Right to Access:** You have the right to request access to the personal data we hold about you. This is commonly known as a “data subject access request.” It allows you to receive a copy of the personal data we hold and to check that we are lawfully processing it.
- **Right to Correction:** You have the right to request the correction of any incomplete or inaccurate data we hold about you.
- **Right to Erasure:** You can request the deletion or removal of your personal data where there is no good reason for us to continue processing it. This is sometimes referred to as the “right to be forgotten.”
- **Right to Object:** You may object to our processing of your personal data where we are relying on a legitimate interest (or those of a third party) and you feel it impacts your fundamental rights and freedoms.
- **Right to Restrict Processing:** You can ask us to suspend the processing of your personal data in certain situations, such as if you want us to verify the data’s accuracy or if you object to our use of the data but need us to retain it for legal claims.
- **Right to Data Portability:** You may request the transfer of your personal data to another party in a structured, commonly used, machine-readable format.
- **Right to Withdraw Consent:** Where we are processing your data based on your consent, you have the right to withdraw that consent at any time. Withdrawing consent will not affect the lawfulness of any processing carried out before you withdraw your consent.

How to Exercise Your Rights

If you wish to exercise any of the rights listed above, please contact us at

thefighterfactory1@gmail.com

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is unfounded, repetitive, or excessive.

10. Contact Details

If you have any questions about this privacy notice or wish to exercise your legal rights, please contact us using the details below:

- **Data Privacy Manager: The Fighter Factory Muay Thai Academy**
- **Email Address:** thefighterfactory1@gmail.com
- **Telephone:** 02393 553594

You have the right to make a complaint to the **Information Commissioner's Office (ICO)**, the UK supervisory authority for data protection issues (www.ico.org.uk), if you are unsatisfied with how we handle your data. However, we would appreciate the chance to deal with your concerns first, so please contact us in the first instance.

11. Changes to this Privacy Policy

We may update this privacy notice from time to time to reflect changes in our data practices or for other operational, legal, or regulatory reasons. Any updates will be posted on this page, and where appropriate, notified to you by email.

We recommend that you review this notice periodically to stay informed about how we protect your personal data.

12. Glossary

Personal Data

Any information relating to an identified or identifiable individual. This could include your name, address, date of birth, phone number, email address, or other identifying information.

Controller

The organisation (in this case, **Limitless Martial Arts**) that determines the purposes and means of processing personal data.

Processor

A third party who processes personal data on behalf of the controller.

Legitimate Interest

The interest of our business in conducting and managing our services to provide the best experience to you. We ensure that we consider and balance any potential impact on you (both positive and negative) and your rights before processing your personal data for our legitimate interests.

Consent

Where you have given clear permission for us to process your personal data for a specific purpose.