

**thrive active mobile app Privacy Notice**  
**Durham County Council**  
**Regeneration and Local Services**  
**Culture and Sport**

**1. Who we are and what we do**

Durham County Council  
Regeneration and Local Services  
Culture and Sport

The Culture & Sport Service provides a range of commercial services and activities which includes health and fitness membership schemes including gyms and swimming.

For the purposes of Data Protection, Durham County Council is the Data Controller for your information.

In this application, we are collecting personal data so that we can tailor the leisure activities to you as a customer.

**2. What type of personal information do we collect and how do we collect it?**

If you have downloaded the app, we will collect:

- **Your favourite Leisure Centre** This is to tailor the services to you on location
- **Activity type** The category of activities you are interested in eg Family, Adults, Young People
- **Your age/date of birth.** To assess eligibility for discounted rates e.g over 60, under 19 and to provide associated prices.
- **Your postcode.** For research purposes and to tailor other information to you.
- **Your membership type, if any.** To provide correct prices and to tailor other information to you.

We do not knowingly collect personal information, without the permission of the parent or guardian, from individuals under 13 years of age. As a parent or legal guardian, please do not allow your children to submit personal information without your permission.

We will collect this information:

- When you first access the thrive active app.
- When you change your user settings

**3. What is our power to obtain and use the personal data?**

We are collecting this information under our legitimate interests to provide this service to you.

6 1 (f) processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party, except where such interests are overridden by

the interests or fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child.

#### **4. What is your personal information used for?**

The thrive active app requires the collection and use of personal data in the following context:

- To allow customer to know the pricing for a chosen activity for their age and membership type.
- To enable the service to contact the customer (through in-app notifications) in the event of there being any disruption to the customer's activities registered through the application.
- To provide the customer with service updates and planned improvements (through in-app notifications) to the service and membership.
- For research and monitoring purposes in order to improve the service provided to customers
- To tailor app content to the individual user.

Participation in any of the above aspects of the service is entirely voluntary on the part of the customer and not bound by statute. You can turn off the application notification at anytime.

In the Thrive application, we collect and processes information about you to:

- help you to access our services.
- inform future service delivery.
- inform you of any changes to, or disruptions in, any services.
- keep in contact with you and help you to make the most of our service offer.

Anonymised data may be used to support public health initiatives.

#### **5. Will your personal information be shared?**

In certain circumstances we do share your personal information.

When we share your information we do it with the following:

- External organisations where we have a statutory obligation to share such, as for the purposes of the prevention or detection of crime or for legal proceedings.

The council shares anonymised statistical data with others such as funding providers and national governing bodies who supply statistics.

#### **6. How do we keep your personal information secure?**

The security of your personal information is important to us. We have a range of security policies and procedures to control and safeguard access to and use of your personal information. This includes the use of passwords and encryption where appropriate.

Further general details on our security arrangements can be provided on request or by visiting the website. If you suspect there may have been a data breach, or

wish to make a complaint, please contact us immediately at [dataprotection@durham.gov.uk](mailto:dataprotection@durham.gov.uk).

#### **7. How long will we keep your personal information?**

We keep your information for as long as it is necessary and proportionate to do so. If you uninstal the application, the information is removed from the application. However, we retain that information on our systems as we do not know when you have uninstalled the application.

If you uninstal the application and would like your data removed earlier than the year, please contact [csbusinessdevelopment@durham.gov.uk](mailto:csbusinessdevelopment@durham.gov.uk)

We will hold your personal information for this application as long as it is in use. If an application is not used within a year, we will delete the information we hold and you will need to reinstall the application and provide your information to us.

#### **8. Is your personal information processed outside the European Union (EU)**

We do not process your personal information outside the EU.

#### **9. Marketing (if applicable)**

At no time will your information be passed to organisations external to us and our partners for marketing or sales purposes or for any commercial use without your prior express consent.

We will only market our services to you if you have expressly given us consent to do so via the thrive active app.

#### **10. What are your Information Rights?**

Your Information Rights are set out in the law. Subject to some legal exceptions, you have the:

- Right to be informed – this notice is provided to you by the Council in compliance with this right.
- Right of access – Please see [www.durham.gov.uk/inforights](http://www.durham.gov.uk/inforights)
- Right to rectification – if you believe any information we hold about you is inaccurate, please let us know.
- Right to erasure – in some circumstances you may have a “right to be forgotten”. You will need to contact us and tell us what personal information you want to have erased.
- We will let you know if we can comply with your request and give reasons if we cannot.
- Right to restrict processing – if you are not happy with the way we are processing your data, you can ask us to stop processing it. We will let you know if we can comply with your request and give reasons if not.
- Right to data portability – if you have consented to us processing your data by automated means, and you request a copy of your data, we will provide it to you in an organised, frequently used and machine readable form within 1 month (or 3 if the request is complex).
- Right to object – this right applies if the lawful basis for processing your data is something other than consent. You will need to contact us and explain

the nature of your objection. We will respond to your objection within 30 days.

- Rights related to automated decision making and profiling – if we apply automated decision making or profiling, you may have the right to request human intervention.

You should contact us and set out your concerns. We will respond to you once we have considered your concerns.

To learn more about these rights please see the Information Commissioner's Office (ICO) website.

If something goes wrong with your personal information, or you have questions about how we use it, please contact the Data Protection Officer at [DPO@durham.gov.uk](mailto:DPO@durham.gov.uk).

If we have not been able to deal with your complaint, you can also contact the ICO:

Information Commissioner's Office  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5 AF

Telephone: 0303 123 1113 (local rate) or 01625 545 745  
Fax: 01625 524 510

Privacy Notice live in November 2018