



Leisure and Wellbeing Services Privacy Notice

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This Privacy Notice was last updated in August 2023. It is regularly reviewed and may be updated or revised at any time. Please refer to this page for the most up-to-date information [Leisure and Wellbeing Services Privacy Notice \(wigan.gov.uk\)](https://www.wigan.gov.uk/leisure-and-wellbeing-services-privacy-notice).

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes.

1. INTRODUCTION

Our core data protection obligations and commitments are set out in the Council's Primary Privacy Notice.

This notice provides additional privacy information for **Leisure and Wellbeing Services**.

Be Well is Wigan Council's new holistic approach to health and wellbeing. Be Well brings leisure and wellbeing services together under one roof, helping to make an even bigger impact on the health and wellbeing of residents and customers, in the heart of their local community.

Whether you're looking to ease your way back into fitness or are already a full-time fitness fan, there's something for everyone at Be Well, whatever your age or ability.

From local leisure centres to weight management programmes, guided walks to junior fitness, inclusive activities to water sports - we've got everything residents in the borough need to get fit and active and lead healthier, happier lives as a result.

Be Well is a mix of free and paid for activities, with plenty of choice to suit you and your needs.

This notice provides information for customers who use the following services:

- Lifestyle card holders
- Gym members
- Gymnastics
- Tennis
- Golf
- Weight Management
- Children's weight management
- Holiday Activity Voucher Scheme
- Holiday Activity Programme
- Health Improvement Services

- Parks Activities
- Walking & Cycling Activities



2. WHAT PERSONAL INFORMATION DO WE COLLECT

In order to provide the services as outlined above, we may collect, store and use the following personal information:

- Information provided voluntarily by you. For example, where you register for information, apply for a particular service, volunteer or make a comment/complaint.
- Name
- Address
- Contact details
- Email address
- Telephone number
- Emergency contact details
- Bank details
- Basic health information where relevant
- Date of birth
- Gender
- Disability
- Bank details
- Payment transaction history
- Official evidence relating to eligibility for concession memberships
- Correspondence
- CCTV images

Please note that this is not an exhaustive list.

Note: any photos or videos of activities are managed by the Public Relations Team and further information about how this personal data is processed can be found in the Public Relations privacy notice on the Council's website.

Special Categories:

We may also collect, store and use the following "special categories" of more sensitive personal information. This may include but is not limited to:

- Information about your race or ethnicity, religious beliefs and sexual orientation
- Physical or mental health
(to ensure equality of provision and the right service support)
- Information from birth certifications received via NHS Digital including date of birth, NHS number and postcode of mother.
- Information about lifestyle behaviours, including data collected from surveys
- Information from National Child Measurement Programme (NCMP)
- Information about your race or ethnicity, religious beliefs and sexual orientation
- Important information from other health professionals or your family

- Important information from other health professionals, relatives or those who care for you and know you well
- Results from any tests you have had
- Information about your health and what we are doing to help you, in the context of health and social care use, including:
 - GP services
 - Hospital services
 - NHS community services
 - Mental Health Services
 - Health Routes Service
 - Community Link Worker Services

3. HOW WE USE PERSONAL INFORMATION

The main purpose for collecting and using your personal information is in order to carry out activities and obligations as a provider of services to you, including:

- Collecting membership payments
- For managing and checking the quality of our services
- For ensuring the health and safety of our staff
- To help investigate any concerns or complaints you have about our services and for answering enquiries under access legislation
- In carrying out our regulatory activities, such as safeguarding, etc.
- To improve the general experience of our customers and of visitors to our websites
- For managing any online transactions you may elect to make and/or marketing choices or preferences you may have expressed
- For research or statistical purposes
- National Child Measurement Programme
- NHS Health Check Programme
- Organising and supporting the 0-5 health service and school nursing services
- Organising and supporting the Health Improvement and Community Link Worker services

4. LEGAL BASIS FOR PROCESSING

The main legal bases we rely on for processing your personal information are:

- Consent: where you have given clear consent for us to process your personal information for a specific purpose
- Contract: the processing is necessary for a contract the council has with you or because we have asked you to take steps/provide information before entering into a contract
- Public task: Processing is necessary for the performance of a task carried out in the public interest. Where it is necessary for carrying out obligations under social protection law, public health law or in the substantial public interest (for

special category data).



5. WHO DO WE SHARE PERSONAL INFORMATION WITH

In addition to the general reasons for information sharing described in the Council's Primary Privacy Notice, we may share information with the following:

- The facilities at which you train, who will process the data as an independent data controller, if and to the extent that you decide to share the data with them/unless you decide not to share the data with any of them. You can manage your preferences using the "Your gyms" section in the "Settings" section of your personal Mywellness® area. To obtain information about the data processing carried out by these data controllers, please refer to their privacy policy statements
- Third parties (as independent data controllers) who offer you their products or services directly, who you allow to connect to the Mywellness® Service (for example if you use a wearable mobile device, to track your training and connect that device to the Mywellness® Service, or if you share your training sessions on Facebook). To obtain information about the data processing carried out by these data controllers, please refer to their privacy policy statements
- With other users (for example anyone taking part in the same Challenge, or training with Technogym® Live); for these functions, you can change the settings on your profile by accessing the "My Details" Section, "Profile Preferences"
- For Weight Management programs, data is shared with Public Health
- NHS trusts and hospitals that are involved in your care
- Clinical commissioning groups and other NHS bodies
- General Practitioners (GPs)
- Ambulance Services

Please note that this is not an exhaustive list.

For gym memberships:

- Data is shared with Debit Finance when you complete a direct debit form
- Data is processed by XN Leisure, which is the system which securely holds member data.

There is a legal duty on local authorities and their partners to co-operate in promoting the well-being of children and young people and adults and to make arrangements to safeguard and promote their welfare and to prevent crime and disorder. There is also a fiduciary duty to protect the public purse.

In this context partners who we may share information with where a concern has been raised or it is in the public interest include:

- Other internal departments/services
- The police
- Court
- Health service providers

- Department for Education
- Department for Health and Social Care
- EVouchers to assist in the delivery of the Holiday Activity & Food (HAF) Programme
- Social care Services
- Education Services
- Voluntary and private sector providers working with the Council.



6. HOW LONG DO WE KEEP PERSONAL INFORMATION

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any future legal, accounting, or reporting requirements. Personal data will be deleted 6 years after membership/use of the service ceases.

We must continue to retain necessary information in accordance with our Corporate Records Management Policy to fulfil legal, statutory and regulatory requirements.

7. AUTOMATED DECISIONS

All the decisions we make about you will involve human intervention.

8. COOKIES

To find out how we use cookies, please see [Cookies \(wigan.gov.uk\)](https://www.wigan.gov.uk/cookies).

9. YOUR RIGHTS

More information on how to seek advice in order to exercise your rights, raise a concern or complain about the handling of your personal information by the council can be found at [Wigan Borough Council Primary Privacy Notice](#).