

## BUCB Privacy Notice

This Privacy Notice explains how BU Community Business Limited (“BUCB” / “we” / “us” / “our”) collects, uses and shares personal information about prospective, present and past customers and visitors of BUCB facilities and services (“you”, “your”), and your rights in relation to the information we hold about you.

BUCB is the controller of the information we collect and process as described in this notice and we are subject to the UK General Data Protection Regulation and the Data Protection Act 2018 (together the “data protection legislation”).

BUCB is a wholly owned subsidiary of Bournemouth University Higher Education Corporation (“BU”). BU staff support BUCB with the operation of BUCB facilities, including processing personal data on behalf of BUCB. BU’s privacy notices are available at:

* <https://www.bournemouth.ac.uk/why-bu/sportbu/about-sportbu/terms-conditions-privacy-statements> and
* <https://www.bournemouth.ac.uk/about/governance/access-information/data-protection-privacy>.

**How we collect your information**

The information we hold about you includes information we collect:

* from you or your club/event organiser when you/they communicate with us, for example to make enquiries and to book and attend our facilities;; and

from third parties who may report a concern with us about you or on your behalf (such as a health and safety accident or incident relating to our facilities, any safeguarding concerns or other concerns in relation to our services and facilities).

**How we hold your information**

We hold your information within:

* the Skedda booking system (the software system we use to manage BUCB’s bookings). We will be changing to an Xn Leisure system during 2024. The Xn Leisure system will be provided to us via BU, by their sub processor, Xn Leisure Systems Limited whose privacy notice is available here [Xn-Leisure-Systems-Ltd-Privacy-Policy.pdf](https://xnleisure.com/wp-content/uploads/2023/05/Xn-Leisure-Systems-Ltd-Privacy-Policy.pdf);
* the AdminControl Board Portal system (the cloud based software we use to facilitate our Board meetings and to generate our Board packs). AdminControl AS’s privacy notice is available here <https://admincontrol.com/privacy/>;
* our paper based filing systems; and
* other electronic databases or filing facilities within our IT systems.

We only share your personal data with third parties as described in the next section, and this never involves selling your data or passing on mailing lists to third parties.

**The types of information we collect**

We may collect the following types of personal data about you:

* your name and contact details (including your address, telephone number and email address);
* your membership of any sporting club or other group which use our facilities or organise an event that you attend at our facilities;
* facilities usage, bookings selected and associated payments;
* CCTV images at our facilities (CCTV footage is processed in accordance with BU’s [CCTV policy and procedure](https://intranetsp.bournemouth.ac.uk/policy/CCTV%20Policy%20and%20Procedures.pdf)s); and

details of your attendance and participation at any BUCB meetings, such as the Operational Steering Group, AGP Steering Group and Board meetings, if you are invited by us and agree to join.

**How we use information about you**

The purposes for which we may use your personal data (including special categories of data) include:

* processing your enquiry, such as a facility hire, leasehold or event booking request;
* managing your on-going facility hire, lease or event booking;
* ensuring your or third parties’ safety and security;
* making reasonable adjustments to enable you to access our services, facilities and/or events;
* collecting your facility hire, lease or event booking fees;
* other administrative purposes, including:
* arranging and facilitating our Operational Steering Group, AGP Steering Group and Board meetings, producing the minutes of such meetings and following up on associated actions;
* providing operational information (e.g. information about site closures, cancellation of bookings, restrictions on use of facilities or safety advice);
* promoting BUCB’s facilities and services; dealing with enquiries or concerns (including responding to any requests made under the data protection legislation or other legislation);
* ensuring a safe and secure environment, preventing crime and anti-social behaviour and facilitating the detection or prosecution of criminal behaviour at our facilities;
* for investigating and responding to incidents; and
* carrying out statistical analysis.

**The bases for processing your information**

We may process your personal data because it is necessary for the performance of our agreement with you or to take steps at your request prior to entering into an agreement with you. In this respect, we will use your personal data for the following:

* to interact with you or your club/event leader before you start using our facilities, as part of the booking process;
* once you have booked our facilities, to provide you with the facilities, services and activities as set out in your hire agreement or lease;
* to deal with any concerns or feedback you may have; and
* to enable your participation in our Operational Steering Group, AGP Steering Group and or Board meetings, where applicable.

We may also process your personal data because it is necessary for our or a third party’s legitimate interests. In this respect, we may use your personal data for the following:

* to monitor and evaluate the performance and effectiveness of BUCB’s facilities and services;
* statistical analysis to maintain and improve our facilities and services;
* to seek advice on our rights and obligations, such as where we require our own legal advice;
* to investigate concerns raised in relation to activities at our facilities; and
* recovering money you owe to us.

We may also process your personal data for our compliance with our legal obligations. In this respect, we may use your personal data for the following:

* to meet our compliance and regulatory obligations, such as health and safety, making reasonable adjustments if you have a disability and to meet safeguarding requirements;
* for the prevention and detection of crime; and
* to assist with investigations (including criminal investigations) carried out by the police and other regulatory agencies.

We may also process your personal data where:

* it is necessary to protect your or another person’s vital interests (for example, the provision of first aid treatment, or contact with the emergency services or health professional. Although only if it is not possible for us to obtain a valid consent from you to the processing of your personal data); or
* we have your specific or, where necessary, explicit consent to do so.

**Sharing information with others**

For the purposes referred to in this privacy notice and relying on the bases for processing as set out above, we may disclose limited personal data to a variety of recipients including:

* our directors and officers, those BU employees who support us with the operation of our facilities and services, agents and contractors (such as our insurers, auditors and external solicitors) where there is a legitimate reason for their receiving the information;
* the sporting clubs/sections, leaseholders and our catering provider who use or operate on the Chapel Gate site (your contact details for example, if you ask us to pass on a message to them for response);
* emergency services or health care professionals;
* the police;
* the national governing bodies for the sports you are involved with (who help manage the facilities for us);
* if you are under 18, your parent/guardian;
* your emergency contact;
* CCTV data may in certain circumstances be shared with:
	+ the police, where they believe that a crime has been or may have been committed or they have another lawful basis and we are satisfied that the CCTV footage may assist them in their investigation and disclosure would comply with the data protection legislation; or
	+ other third parties, but only if we are satisfied that there is a clear legal basis for doing so and that it will be fair to the individuals who are the focus of the request, including consideration of whether to notify those individuals before access to the footage is provided if their identities are known and this is feasible.

We, and BU acting on our behalf, use data processors. Data processors are third parties who provide elements of services for us. We or BU have contracts in place with these data processors. This means that they cannot do anything with your personal information unless we or BU have instructed them to do it. They will hold your personal information securely and retain it for the period we instruct. They will not share your personal information with any organisation apart from us and BU. Where it is necessary for us to transfer your personal information outside of the UK, this will only be done in accordance with the UK GDPR.

**Changes to your personal data**

Please tell us promptly about any changes to the information we hold about you. You can do this by email to chapelgate@bournemouth.ac.uk or in person at the Chapel Gate main reception desk.

**Overseas transfers of your personal data**

Data protection laws limit our ability to transfer personal data outside the countries within

the UK and countries, such as the those within the European Economic Area, which are

subject to an adequacy decision (Restricted Transfers) (i.e. the countries which are subject

to the same or very similar data protection laws). This is to help ensure that a consistent

level of data protection applies to your personal data at all stages of processing, and that you are not

exposed to additional privacy risks through the transfer of your personal data. Restricted Transfers

are only permitted in certain circumstances. Where such Restricted Transfers are necessary,

we ensure that we have appropriate safeguards in place.

There may be a Restricted Transfer of your personal data outside the UK in the following

circumstances:

• Where we use a cloud-based IT system to hold your data, and the data in the cloud is

stored on servers located outside the UK in a country which is not subject to an

adequacy decision. In these circumstances we safeguard your data through

undertaking, or ensuring that BU undertakes, appropriate checks on the levels of security offered by the cloud provider and entering into a contract with them which applies protections of the

same type and level required by data protection laws within the UK; or

• with your consent.

Third party providers of event booking systems will separately inform you of any outside UK transfers they make while providing their service.

**How long will we keep your information for?**

We will usually keep your personal data for a maximum of 6 years after your membership or usage of our facilities and services comes to an end.

**Your rights**

Under the data protection laws you have the following rights:

* to obtain access to, and copies of, the personal data that we hold about you;
* to require us to correct the personal data we hold about you if it is incorrect;
* to require us to erase your personal data;
* to require us to restrict our data processing activities (and, where our processing is based on your consent, you may withdraw that consent, without affecting the lawfulness of our processing based on consent before its withdrawal);
* to receive from us the personal data we hold about you which you have provided to us, on the basis of consent or as necessary for the performance of a contract between us, in a reasonable format specified by you, including for the purpose of you transmitting that personal data to another data controller;
* to object, on grounds relating to your particular situation, to any of our particular processing activities where you feel this has a disproportionate impact on your rights.

Please note that the above rights are not absolute, and we may be entitled to refuse requests where exceptions apply.

If you have given your consent and you wish to withdraw it, please contact our Data Protection Officer using the contact details set out below. Where our processing of your personal data relies on your consent and where you then withdraw that consent, we may not be able to provide all or some aspects of our services to you and/or it may affect the provision of those services.

**Contact us**

If you have any queries about this privacy notice or how we process your personal data, you can contact our Data Protection Officer (DPO) by email: dpo@bournemouth.ac.uk; by telephone: +44 (0) 1202 962554; or by post: Data Protection Officer, Bournemouth University, Poole House 5th Floor, Fern Barrow, Poole, Dorset, BH12 5BB.

If you would like to exercise any of your rights as outlined above, you can contact the DPO.

We will always aim to respond clearly and fully to any concerns you have about our processing and requests to exercise the rights set out above. However, if you are not satisfied with how we are processing your personal data, you can make a complaint to the Information Commissioner.

Online reporting: <https://ico.org.uk/concerns/>

Email: casework@ico.org.uk

Tel: 0303 123 1113

Post:

Information Commissioner’s Office

Wycliffe House

Water Lane

Wilmslow

Cheshire SK9 5AF

You can find out more about your rights under data protection legislation from the Information Commissioner's Office website available at: [www.ico.org.uk](http://www.ico.org.uk).