



## Wugong Academy (Wugong CIC) - Privacy Policy

### 1. Introduction Last updated: 30<sup>th</sup> September 2019

1. 1.1 The Wugong Academy ('wugong', 'we', 'our', 'us') is committed to protecting and respecting your privacy. We are a member of the BCCMA who are the National Governing Body (NGB) for Chinese martial arts in the United Kingdom.
1. 1.2 This policy sets out the basis on which we will process any personal data or usage information we collect from you, or that you provide to us, in connection with your use of our websites [www.wugong.co.uk](http://www.wugong.co.uk), [www.canterburymartialarts.co.uk](http://www.canterburymartialarts.co.uk), social media, championships, tournaments or other services. Please read this policy carefully so that you understand your rights in relation to your personal data, and how we will collect, use and process your personal data. If you do not agree with this Privacy Policy in general or any part of it, you should not access the websites, social media or make use of our services.

### 2. Data Controller

1. 2.1 Wugong is the data controller and responsible for your personal data.
2. 2.2 If you have any questions about the privacy and cookie policy of wugong, including any requests to exercise your legal rights, please contact us using the details set out below:
  - Email address: [barry@wugong.co.uk](mailto:barry@wugong.co.uk) the subject 'Privacy Policy'.
  - Postal address: Wugong Academy, 94 Thomas Way, Canterbury CT3 4NH

### 3. What types of information do we collect and how do we use it?

1. 3.1 Information you give us: you may provide information by contacting us via our websites, or by email, telephone, social media or otherwise, or by signing up for our classes, championships, tournaments, events, newsletters or alerts, or by using our other services.
2. 3.2 Photographs and video images: some of our services and events may include photography for promotional use but your image or those from whom you are responsible may be picked up by them during any Wugong activities. Where images of children are taken we will seek the parent or guardian's permission for their use.
3. 3.3 Information provided to us: by a third party and/or collected from public records in the case of fraud or suspected fraud. In the case of fraud or suspected fraud, we may obtain information from third parties and from public records to prevent and detect fraud.
4. 3.4 In delivering our services to you, we will use your information:
  - to communicate with you
  - to create records of activities
  - to establish identification verification for DBS checks
  - acknowledgments, confirmations, receipts and invoices
  - to maintain records of lost property.

3.5 As it is in our legitimate interests to be responsive to you and to ensure the proper functioning of our activities and services, we will use your information:

- to detect and prevent fraud and crime
- for reporting and data analysis purposes
- for insurance purposes
- to comply with our legal and regulatory obligations imposed by B.C.C.M.A, Sport England and the Department for Culture, Media and Sport and other government Departments.
- to meet the members' requirements and for complaint handling and feedback
- to monitor and assess the quality of our activities
- For activities and events nationally and internationally
- to contact you via telephone, email or SMS message
- to identify our users
- if you have opted into marketing, to communicate with you about services, events and other news and information we think will be of interest to you

#### **4. Technical usage information**

1. 4.1 When you visit our websites, we automatically collect the information sent to us by your computer, mobile phone, or other access device. This information includes:
  - your IP address
  - device information including, but not limited to, identifier, name, and type of operating system (including versions)
  - mobile network information
  - standard web information, such as your browser type and the pages you access on our websites
  - mobile device UUID (Unique Download ID) and/or mobile device fingerprint
  - hardware models, software, file names and versions, preferred languages, unique device identifiers, advertising identifiers, serial numbers and device motion information.
2. 4.2 As it is in our legitimate interests to process your data to provide effective services and useful content to you we collect this information in order to:
  - personalise our websites to ensure content from our websites is presented in the most effective manner for you and your device
  - monitor and analyse trends, usage and activity in connection with our websites, and services and to improve our services
  - administer our websites, and for internal operations, in order to conduct troubleshooting, data analysis, testing, research, statistical and survey analysis;
  - keep our websites safe and secure
  - measure and understand the effectiveness of the content we serve to you and others.

#### **5. Profiling**

5.1 Fraud prevention: we match the personal data provided by you against data fields such as name, email address, mobile phone number, and we use this to accept or decline hall bookings. This is a manual process.

2. 5.2 We use your journey through our website to make our advertisements more relevant to you, such as promoting relevant journey types.
3. 5.3 If you would like details of the information we used to create your profile, please contact [barry@wugong.co.uk](mailto:barry@wugong.co.uk) You can request a manual review of our automated processes or object to profiling, including profiling for marketing purposes by contacting [barry@wugong.co.uk](mailto:barry@wugong.co.uk)

## **6. Do we use cookies?**

1. 6.1 We use cookies for authentication of users so we know who they are once logged in while traversing the website.
2. 6.2 We utilise google analytics to record and monitor the usage of our website so we know how frequently sections of our website are used and therefore can work out how best to utilise our resource to support our membership going forward. Google analytics also tracks the path users take while traversing the website.

## **7. How do we share your personal data?**

1. 7.1 We do not sell, rent or lease your personal information to others except as described in this Privacy Policy. We share your information with selected recipients. These categories of recipients include:
  - cloud storage providers located in the UK, to store the personal data you provide and for disaster recovery services, as well as for the performance of any contract we enter into with you
  - provided you have consented, advertisers located in the UK to select and serve relevant marketing and adverts to you and others
  - IT Services providers that provide us with website hosting services
  - analytics and search engine providers located in the UK that assist us in the improvement and optimisation of our website
  - fraud prevention tools located in the UK for the purposes of preventing fraud
  - our insurance company and claims handling companies, for the purpose of investigating and settling any insurance claims.
2. 7.2 We will share your information with law enforcement agencies, public authorities or other organisations if legally required to do so, or if we have a good faith belief that such use is reasonably necessary to:
  - comply with a legal obligation, process or request;
  - enforce our terms and conditions and other agreements, including investigation of any potential violation thereof;
  - detect, prevent or otherwise address security, fraud or technical issues; or
  - protect the rights, property or safety of us, our users, a third party or the public as required or permitted by law (exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction).
3. 7.3 We will also disclose your information to third parties:
  - in the event that we sell any business or assets, in which case we will disclose your data to the prospective buyer of such business or assets; or
  - if we or substantially all of our assets are acquired by a third party, in which case information held by us about our users will be one of the transferred assets.

## **8. Where do we store your personal data?**

1. 8.1 The information that we collect from you will be transferred to, and stored on a locked computer and a phone with thumb access enabled security.
2. 8.2 We will take all steps reasonably necessary to ensure that your personal data is treated securely and in accordance with this policy.

## **9. The security of your personal data**

1. 9.1 Unfortunately, the transmission of information via the internet or email is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your information transmitted through the websites, over email; any transmission is at your own risk. Once we have received your information, we will take appropriate technical and organisational measures to safeguard your personal data against loss, theft and unauthorised use, access or modification.
2. 9.2 We will, from time to time, host links to and from the websites of our affiliates or third parties. If you follow a link to any of these websites, these websites will have their own privacy policies and we do not accept any responsibility or liability for these policies. Please check these policies before you submit any information to those websites.

## **10. How long do we store your personal data?**

1. 10.1 To determine the retention period of your personal data, we consider several criteria to make sure that we do not keep your personal data for longer than is necessary or appropriate. These criteria include:
  - the purpose for which we hold your personal data
  - our legal and regulatory obligations in relation to that personal data, for example any financial reporting obligations and our regulatory obligations to Sport England
  - whether our relationship with you is ongoing, for example, you have an active account with one or more of our brands, you continue to receive marketing communications, or you regularly browse or purchase off our website
  - whether you are no longer actively participating or engaging with our brands, for example, you do not open our emails, visit our websites, or share user generated content
  - any specific requests from you in relation to the deletion of your personal data
  - our legitimate interests in relation to managing our own rights, for example the defence of any claims.
2. 10.2 We will retain your information as follows:
  - your profile and account information (including your technical usage data), for 7 years after you last use our services including hall bookings
  - if you contact us via email we will keep your data for 5 years
  - records of hall bookings, lost property and complaints for a minimum of 12 months (we are required to retain such data to comply with our regulatory requirements).
3. 10.3 After you have terminated your use of our services, we will store your information in an aggregated and anonymised format.

## 11. Opting In

1. 11.1 You can ask us or third parties to stop sending you messages at any time by logging into the website and checking or unchecking relevant boxes to adjust your marketing preferences
2. 11.2 Our opt-in links are available on message sent to you or you can visit our website or contact us.
3. 11.3 When you opt-in this will apply to all personal data provided to us where it may be necessary to retain certain data.

## 12. Your rights

1. 12.1 You have rights in relation to the personal data we hold about you. Some of these only apply in certain circumstances. We have described these situations below, as well as how you can exercise your rights. To exercise any of your rights, please contact us at [barry@wugong.co.uk](mailto:barry@wugong.co.uk)
  - Access: you have the right to ask us to access the personal data we hold about you and be provided with certain information about how we use your personal data and who we share it with.
  - Correction: you also have the right to ask us to correct your personal data where it is inaccurate or incomplete.
  - Portability: where you have provided your personal data to us under contract, you have the right to ask us to share (port) this data to another data controller in a structured, commonly used and machine-readable format.
  - Erasure: in certain circumstances, you have the right to ask us to delete the personal data we hold about you.
  - Restriction: in certain circumstances, you have the right to ask us to restrict (stop any active) processing of your personal data, save for storage.
  - Objection: in certain circumstances, the right to restrict or object to our processing of your personal information (e.g. where you request correction or erasure, you also have a right to restrict processing of your applicable data while your request is considered). You can object to our processing of your personal data based on our legitimate interests and we will no longer process your personal data unless we can demonstrate an overriding legitimate ground.
2. 12.2 In addition, you have the right to complain to the Information Commissioner's Office or other applicable data protection supervisory authority.
3. 12.3 Please note that these rights are limited, for example, where fulfilling your request would adversely affect other individuals or intellectual property, where there are overriding public interest reasons or where we are required by law to retain your personal data.

## 13. Objection to Marketing

13.1 At any time you have the right to object to our processing of data about you in order to send you marketing communications, including where we build profiles for such purposes, and we will stop processing the data for that purpose. You can change your marketing preferences at any time using contact us at [barry@wugong.co.uk](mailto:barry@wugong.co.uk).

## **14. Complaints**

14.1 In the event that you wish to make a complaint about how we process your personal data, please contact us in the first instance at [barry@wugong.co.uk](mailto:barry@wugong.co.uk) and we will endeavour to deal with your request as soon as possible. This is without prejudice to your right to launch a claim with the Information Commissioner's Office if you think we have infringed data protection laws.

## **15. Changes**

15.1 Any changes we will make to this policy in the future will be posted on this page. Please check back frequently to see any updates or changes to this policy.

## **16. Contact**

16.1 Questions, comments and requests regarding this policy are welcomed and should be emailed to the Secretary, with the subject 'Privacy Policy' to [barry@wugong.co.uk](mailto:barry@wugong.co.uk)