



DATA PROTECTION POLICY

1. The High Life membership scheme is delivered in partnership with High Life Highland. Data is held electronically and in paper form by Mallaig Pool & Leisure (MPL) and High Life Highland (HLH). MPL follow both the MPL and HLH Data Protection Policy.
2. Data comprises in the case of members (a) the name of the member and, where available, (b) a postal address and (c) an email address, date of birth, and where necessary bank account details. In the case of junior members, details of parental consent are also held. In the case of employees, MPL holds name, address, date of birth, National Insurance number, email address, phone number and bank account details, as necessary in accordance with employment law. In the case of directors, MPL holds name, address, email address, phone number, a note of memberships of other relevant groups, date of birth, bank account details, and any information disclosed on Declaration of Interest forms.
3. Data is used solely in connection with the activities of MPL, including notice of meetings, AGMs, and for other purposes in accordance with the constitution of MPL. Bank details, if held, are used solely for the purpose of transactions authorised by the person in question.
4. Data is shared only amongst members of the MPL board where necessary for the purpose of the activities of MPL.
5. Data is amended only if current data held ceases to be correct, either by reason of MPL being so informed or MPL itself becoming aware that current data is inaccurate.
6. Data is deleted only if (a) so requested by the party whose data is held (b) a member cancels his or their membership or (c) otherwise in accordance with the constitution of MPL and the HLH GDPR policy.
7. Data in relation to any member may be accessed/amended/erased if requested by that member in accordance with GDPR .
8. Data, whether held on computer, paper or other media, is at all times obtained, handled, processed and stored lawfully in accordance with the Data Protection Act 1998 and GDPR.

9. The High Life Highland Data Protection Statement

Data Protection

The information you have supplied will be used for the purpose(s) for which you have provided it. High Life Highland will also use it to plan improvements and to meet our obligations in delivering services on behalf of The Highland Council. This data will be maintained in accordance with the Data Protection Act 1998 and will not be passed on or sold to any other organisation without your prior approval, unless there is a legal requirement to do so.

Subject Access Requests

High Life Highland may hold personal information about you. We believe it is very important to work in partnership with you and that you should play a part in what is recorded about you. Information about you may be recorded in several ways – e.g. in a personal file, in a project file, or on a Computer Information Database. Both systems are treated confidentially and are kept in a secure manner.

Under the Data Protection Act 1998 you have rights to be informed and to see what information is held about you.

Find out more about your rights on the High Life Highland website.

APPENDIX 1

High Life Leisure Membership Privacy Notice v6 – 4th October 2019

Purpose

- High Life Leisure Membership
 - o All Inclusive
 - o Budget
 - o Free High Life Card (Pay as You Go)

• Description

HLH offer customers use of its facilities as part of the High Life Leisure Membership. Personal information is required to administer your membership contract and is stored in the leisure management software system. If the membership is All Inclusive then payments will be taken either by annual charge or via monthly Direct Debits.

Your contact details will be used to contact you in relation to the membership that you have with High Life Highland.

• If you do not give us your information

If you do not provide High Life Highland with your personal details it will be unable to provide you with a membership card and related benefits.

• Conditions for processing personal information

Contract – HLH need to process this personal information to fulfil the contract with the customer (Article6 (1)(b) of GDPR).

• Your rights

- Access to personal data
- Amendments to your data
- Removal of your personal data
- Change the way we process your personal data

Find out more about your rights on the High Life Highland website.

• Who we share your information with

High Life Highland processes your personal data using third party software and payment systems in order for it to administer High Life leisure memberships. For Budget Members, personal details including Name, Address and Date of Birth will be shared with the Highland Council Welfare Support Team every three months for the purpose of confirming members High Life Leisure Membership Privacy Notice v6 – 4th October 2019 continue to meet the criteria for qualifying for the scheme against those in receipt of Council Administered benefits.

- For a list and more information on third party processors please visit:
www.highlifehighland.com/GDPR/DataProcessors
- **How long we hold your information**
HLH will retain your data whilst you are an active member only. Your data will be removed 2 years after your last engagement with High Life Highland.
- **Automated processing**
Your personal information is not subject to automated decision making or profiling.
- **Data controller**
The data controller is The Highland Council (High Life Highland delivers services on behalf of The Highland Council).
- **Data Protection Officer**
Contact our Data Protection Officer:
Data Protection Officer
Highland Council Headquarters
Glenurquhart Road
Inverness
IV3 5NX
01463 702029
DPO@highlifehighland.com
High Life Leisure Membership Privacy Notice v6 –
4th October 2019
- **Supervisory authority**
If you are unhappy with the way HLH have processed your personal information you can contact the Information Commissioner:
Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF
Tel: 0303 123 1113
<https://ico.org.uk/global/contact-us>