

# **Privacy Notice and GDPR Policy**

MR Functional Fitness — Clients, Members and Participants

**Company name:** MR Functional Fitness

**Registered address:** 40 Ballyclug Mews, BT423GX

**Contact:** movida@live.co.uk; 07572699529

**Effective date:** 2026-04-10

## **Condensed Privacy Summary (UK GDPR) - Sign-up Flow**

### **1. Summary**

We collect and process your personal and health data to provide our services, ensure your safety, and meet UK sport insurance requirements. Next-of-kin details are required for emergency and insurance purposes.

### **2. What we collect**

- Identity & contact
- Emergency contact/next of kin (required)
- Health/special category data
- Transactional & technical
- Marketing preferences (opt-in only)

### **3. Why we collect it and lawful bases**

- Deliver services (contract)
- Protect health & safety and insurance (legitimate interests; explicit consent for health data/Article 9 where applicable)
- Legal obligations
- Marketing (consent)

### **4. Who we share with**

- Next of kin
- Emergency services/medical professionals
- Insurers
- Processors (DPA required)
- No sale of data

### **5. Retention, security, and transfers**

- Retention 7 years typical
- Security measures (role-based access, encryption in transit/at rest, backups)
- International transfers only with safeguards (UK IDTA/SCCs or adequacy)

### **6. Your rights and how to exercise them**

- Access, rectify, erase, restrict, object, portability, withdraw consent
- Contact: [movida@live.co.uk](mailto:movida@live.co.uk)
- ICO complaint option

## **1. Introduction (purpose and scope)**

MR Functional Fitness is committed to protecting your personal data. This Privacy Notice applies to clients, members, participants, and prospective clients. It explains how we collect, use, store, share, and protect your personal data in connection with our services and sign-up process. We require next-of-kin details as part of our UK sport insurance policy and for emergency contact purposes.

## **2. Data we collect (detailed categories)**

We collect the following categories of personal data:

- Identity and contact details: full name, date of birth, address, email, phone.
- Emergency contact / next of kin: name, relationship, phone, email. Required for insurance and safety.
- Health and special category data: medical history, PAR-Q/fitness questionnaire responses, disability information, medication, allergies. This data is sensitive and collected to ensure your safety.
- Transactional and financial: booking history, payment references, last 4 digits of card, invoices.
- Technical and usage: IP address, device, cookies for security and fraud prevention.
- Marketing preferences and communications: opt-in choices, communication channels.
- CCTV or images: may be captured during classes or events; signage will be displayed. Lawful basis: legitimate interests.

## **3. How we collect data**

We collect data directly from you via sign-up forms, intake questionnaires, phone, email, and in person. We may also receive data from third parties such as insurers, emergency services, or coaches, where necessary and lawful. Public sources may be used only when appropriate and permitted.

## **4. Purposes and lawful bases for processing (detailed)**

- To provide services and fulfil contracts (e.g., bookings, class provision, membership management) — lawful basis: contract.
- To protect health and safety, manage medical needs, and meet insurance obligations — lawful basis: legitimate interests. For health data, we rely on explicit consent or another Article 9 condition. Consent is sought during sign-up and recorded.
- To comply with legal obligations (e.g., safeguarding, insurance, tax) — lawful basis: legal obligation.
- For marketing communications — lawful basis: consent. You can opt in and withdraw at any time.
- For fraud prevention, security, and legal claims — lawful basis: legitimate interests.

## **5. Sharing and disclosures (who we share with and why)**

- Next of kin and emergency contacts: shared only when necessary for safety or insurance.
- Emergency services and medical professionals: when needed to protect life or health.
- Insurers and brokers: to comply with policy terms and process claims.
- Service providers and processors: payment processors, booking/CRM systems, email platforms, IT providers — only under written Data Processing Agreements (DPAs).
- Legal and regulatory authorities: where required by law or to defend legal claims.

We do not sell personal data. We share only the minimum necessary and record the lawful basis for each disclosure.

## **6. International transfers**

We may transfer your data outside the UK only with appropriate safeguards in place, such as the UK International Data Transfer Agreement (IDTA), Standard Contractual Clauses (SCCs), or adequacy decisions. You may request details of these safeguards.

## **7. Retention and deletion**

We retain client and health records for 7 years or as required by law or insurance. Financial records are kept per statutory requirements. Marketing consents are retained until withdrawn. Data is securely deleted or anonymised when no longer needed.

## **8. Security measures**

We implement technical and organisational measures including role-based access controls, staff training, encryption in transit and at rest, secure backups, and incident response procedures. We notify affected individuals and the ICO in the event of a data breach.

## **9. Children and vulnerable people**

We require parental consent for individuals under 16. Additional safeguards are in place for vulnerable adults, including capacity assessments and guardian involvement where appropriate.

## **10. Your rights under UK GDPR**

You have the right to be informed, access your data, request rectification or erasure, restrict or object to processing, data portability, withdraw consent, and object to automated decision-making. To exercise your rights, contact [movida@live.co.uk](mailto:movida@live.co.uk). We aim to respond within one month. You may also contact the Information Commissioner's Office (ICO) if unsatisfied.

## **11. Consent and how we record it**

We obtain explicit consent for processing health data and for marketing communications. Consent is recorded and can be withdrawn at any time. Staff are instructed to keep dated records of consent and ensure DPAs are in place before sharing data with processors.

## **12. Data Protection Impact Assessments (DPIAs)**

We conduct DPIAs when introducing new systems or engaging in large-scale processing of sensitive data. DPIA outcomes inform our risk mitigation strategies.

## **13. Changes to this notice**

We may update this notice from time to time. Changes will be communicated via our website or email. The effective date will be updated accordingly.

## **14. Contact details and data protection officer**

For data protection queries, contact [movida@live.co.uk](mailto:movida@live.co.uk) or call 07572699529. Our registered address is 40 Ballyclug Mews, BT423GX. We do not currently have a designated Data Protection Officer.

## **15. Signature acknowledgement and intake fields**

I confirm I have read and understood this Privacy Notice and GDPR Policy.

Name: \_\_\_\_\_

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

■ I consent to the processing of my health data.

■ I consent to sharing my next-of-kin details with insurers and emergency services.

Staff note: keep dated records of explicit consent for health data and ensure DPAs are in place before sharing data with processors.