

Privacy Statement

Who We Are

East Ayrshire Leisure is a Scottish Charitable Independent Organisation (SCIO) and meets the requirements of the Office of the Scottish Charity Regulator (OSCR). On 1st July 2013 East Ayrshire Leisure assumed responsibility for the operation and management of a range of cultural, countryside and sports facilities and services on behalf of East Ayrshire Council.

Data Protection and Privacy

In order to deliver services to the residents and communities in East Ayrshire, it is necessary for East Ayrshire Leisure Trust to collect, gather and process personal data about residents, employees and other individuals.

In compliance with the Data Protection Act 2018, East Ayrshire Leisure has registered as a Data Controller with the Information Commissioner's Office (ICO).

Registration number: ZA235348

This registration can be viewed on the ICO website:

<https://ico.org.uk/about-the-ico/what-we-do/register-of-data-controllers/>

As a Data Controller, East Ayrshire Leisure determines the purpose and methods for processing information and ensures safeguards over any personal and/or sensitive information it handles.

Data Controller

The Data Controller for East Ayrshire Leisure is Jackie Biggart and can be contacted by emailing: EALInformationgovernance@eastayrshireleisure.com

Why We Process Your Data

East Ayrshire Leisure is required to process personal data lawfully and in accordance with current Data Protection legislation. Information is processed by East Ayrshire Leisure in the UK and/or the EU.

In order to deliver services to the residents and communities of East Ayrshire we need access to personal information about clients, customers and employees. This information can be sensitive in nature so we put safeguards in place to ensure that:

- We only gather as much information as we need, and no more
- The information is accurate and up to date
- The information is only used for the purpose intended
- We keep the information only for as long as we need to

We will not disclose personal information to third parties for marketing purposes without your consent or use your personal data in a way that may cause unwarranted detriment.

However there are circumstances where East Ayrshire Leisure is legally required to disclose information:

- For the purpose of performing statutory enforcement duties
- Disclosures required by law
- For the purpose of detecting/preventing fraud
- For the purpose of detecting/preventing crime
- Auditing/administering public funds

Data Matching

East Ayrshire Leisure is required by law to protect the public funds it administers. It may share information provided to it with other bodies responsible for auditing or administering public funds in order to prevent and detect fraud.

Sharing and Protecting Your Information

East Ayrshire Leisure will only share your information where it is required to do so, such as where services are delivered jointly with other organisations. We will tell you who these organisations are when we gather your information. This is detailed further in each of our specific services 'Privacy Notices'.

In order to provide services to you we may need to appoint other organisations to carry out some activities on our behalf. These may include, for example, payment processing organisations, delivery organisations, mailing houses and contractors or consultants providing services to East Ayrshire Leisure (or directly to service users) where we need to provide them with personal information to allow them to provide these services. We select these organisations carefully and put measures in place to make sure that they are not allowed to do anything with your personal information which East Ayrshire Leisure could not do itself.

Where information is shared with other organisations or processed on our behalf, we will ensure adequate protection by ensuring contracts and sharing agreements are in place that define security controls around the sharing of the information.

East Ayrshire Leisure has a [Data Protection Policy](#). This policy is regularly reviewed by the Data Protection Officer to ensure that East Ayrshire Leisure complies with the requirements of the data protection law.

All East Ayrshire Leisure employees are required to undertake data protection and information security training to ensure that personal data is processed in accordance with the data protection principles.

How Long We Keep Your Information

We will keep your information for the minimum period necessary. After this time information is deleted or securely destroyed in accordance with East Ayrshire Leisure's [approved retention schedules](#).

Service Privacy Notices

To learn more about East Ayrshire Leisure services and how we use information in specific circumstances click on the relevant link below:

- [Cultural Services](#)
- [Countryside & Outdoor Activities](#)
- [Sport & Fitness](#)
- [Marketing & Development](#)
- [Human Resources](#)
- [Finance & Administration Services](#)

How to Make an Enquiry or Lodge a Complaint

Depending on why we need your information, you will have rights to how your information is used.

East Ayrshire Leisure has a lawful basis for the gathering and processing of information necessary for the delivery of services. You have the right to request that we stop processing your personal data in relation to any East Ayrshire Leisure services. However, this may cause delays or prevent us delivering a service to you. Where possible we will seek to comply with such requests but this may not be possible where East Ayrshire Leisure is required to do so by law to safeguard public safety, where there is a risk of harm or in emergency situations.

Where East Ayrshire Leisure is relying on your consent to process information then you have the right to withdraw this consent at any time. Details of how to withdraw your consent will be given to you at the time you provide your consent.

Please submit an enquiry to us if you would like to:

- Obtain your information we hold
- Verify, correct or update your information
- Understand how we have arrived at a decision about you
- If you have a concern, complaint, objection or request a restriction on how we process your information
- Enquire regarding data portability and whether you can transfer your data to another organisation

We will endeavour to respond to enquiries within 30 days of their submission.

Information on How We Use Cookies

Cookies are small pieces of data which are placed on your computer, mobile or tablet as you browse the internet. These allow a website to store information within your web browser. The site will use the cookies to remember information about your browsing history. e.g. the pages you visit and how often and the online resources you use etc. Cookies are sometimes also called web cookies, browser cookies or HTTP cookies.

There are many types of cookies but the two most common used by websites are persistent cookies and session cookies.

Session cookies only last as long as you are using a website and your web browser will normally delete this cookie when you close it.

Persistent cookies have an expiry date set by the website and these are stored on your computer by your web browser. These cookies outlast session cookies and are available to the website each time you visit.

Our site uses google analytics to collect information about how visitors use our site. We then use this information to compile reports and to help us improve the site. The cookies do not collect personal information - information is collected in an anonymous form including the number of visitors to the site, where visitors have come to the site from and the pages they visited.

To find out more about managing cookies on your device, please refer to <http://www.allaboutcookies.org>

We may also install cookies to monitor the success of online marketing activity for this website.

Public Space CCTV

Signage alerting the public to the use of CCTV is displayed within the facility in which it is operational.

Images of individuals may be collected on CCTV cameras. It is necessary to collect such images for the following purposes:

- To help with reduction or negation of criminal activity
- To help apprehend or prosecute offenders

The processing of CCTV information is necessary for the performance of a task carried out in the public interest. Where CCTV may capture more sensitive information about individuals the processing is necessary for the reason of substantial public interest, for the prevention and detection of unlawful acts.

The retention of CCTV images from cameras is 30 days, after this time images are overwritten unless required by law enforcement, solicitors, or insurance providers for the provision of evidence.

Contact Details for Enquiries:

Data Controller

Jackie Biggart

East Ayrshire Leisure

Western Road

Kilmarnock

KA3 1LL

Tel: 01563 554026

Email: EALInformationgovernance@eastayrshireleisure.com

Data Protection Officer

Robert Gibson

East Ayrshire Council Headquarters

London Road

Kilmarnock

KA3 7BU

Tel: 01563 576094

Email: Information.governance@east-ayrshire.gov.uk

General Customer Enquiries:

email: info@eastayrshireleisure.com

For independent advice or to lodge a complaint about data protection, privacy and data sharing issues, you can contact the Information Commissioner's Office (ICO) at:

Information Commissioner's Office

Wycliffe House

Water Lane

Wilmslow

Cheshire

SK9 5AF

Tel: 0303 123 1113

Email: casework@ico.org.uk

Alternatively visit: <https://ico.org.uk>