



Lush Fitness Data Protection and Privacy Policy

Effective Date: 5/5/2025

Lush Fitness is committed to safeguarding your personal information and complying with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018. This policy explains how we collect, use, store, and protect your data.

1. Accessing Your Data

You have the right to access the personal information we hold about you at any time. To request this, please contact:

 **lushfitness@hotmail.co.uk**
 **07769 651899**

2. Lawful Basis for Processing Your Information

Under UK GDPR, Lush Fitness processes your personal data on the following lawful bases:

- **Consent** – when you provide permission for us to send marketing materials, use photographs, or communicate with your GP or health practitioner.
 - **Contractual Necessity** – to deliver training services (e.g., processing health data to provide safe exercise programmes).
 - **Legal Obligation** – for record-keeping required by insurance or tax purposes.
 - **Legitimate Interest** – to notify you about class updates, wellbeing check-ins, or respond to enquiries.
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3. Data Collection and Storage

What We Collect

Unless otherwise specified in this policy, we may collect and store:

Short-Term Data Collection

(Retained for up to **12 months** from the date of initial contact)

Short-term information is collected when individuals make an enquiry, join a waiting list, or attend a free trial session. This information may include:

- Name, address, phone number, emergency contact, date of birth
- Email address

- Relevant details about training interests or medical suitability (if provided)

This data is securely stored and retained for up to 12 months from the date of initial contact. After this period, it will be safely deleted or destroyed unless the individual becomes a paying client, in which case longer retention periods apply.

You may request deletion of your personal data at any time by contacting Lush Fitness.

Long Term Data Collection (7 years)

The following personal data may be collected and retained for up to 7 years to comply with insurance and legal obligations:

- Name, address, phone number, emergency contact, and date of birth (collected via the Medical Questionnaire)
- Email address
- Class/session notes and programme records
- Medical history (past and present, including relevant health disclosures)
- Communication history (including emails, texts, and messages related to your training)
- **Emergency contact details** – stored under the lawful basis of *Vital Interest*, to be used only in the event of a serious incident during a session.

How It's Stored

- Digital records: Stored on a password-protected encrypted online server and backed up on a password-protected encrypted external hard drive.
- Hard copies: Stored in a locked filing cabinet.
- Mobile phone: Client contact numbers are kept on a password-protected encrypted business device.

4. Health Questionnaires & Medical History

- Clients are responsible for informing Lush Fitness of any changes to their health or medication.
- Health history and related personal information collected for free trial sessions will be securely stored and retained for up to **12 months** from the date of the trial. After this period, the data will be safely deleted or destroyed unless the individual becomes a paying client, in which case longer retention periods apply.
- Health records and session notes for paying clients are retained for **up to 7 years** for insurance and legal purposes.
- For clients with complex medical histories, records may be retained **indefinitely**, unless a specific removal request is made, and no legal obligation prevents deletion.
- In some cases, data required for legal or insurance reasons (e.g., session notes) may be retained for the full 7-year period **even if a deletion request is made**, as permitted under data protection law.

- With written consent, Lush Fitness may contact your GP or other healthcare professionals to ensure safe participation in exercise. Copies of any correspondence will be provided to you.
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5. Communications

Phone Numbers Stored on Mobile Device

Used to inform you about:

- Session/class changes or cancellations
- General wellbeing or check-ins
- Programme progression

Email Addresses

Used to send:

- Term dates (via Mailchimp)
- Class updates and reminders
- Personal programmes and wellbeing support
- Policy and terms updates
- Occasional marketing with your consent

Retention: Email addresses are deleted from Mailchimp after each use.

Lush Fitness uses Mailchimp as a third-party email platform. Email addresses are uploaded securely and deleted after use. Mailchimp's data processing complies with UK GDPR standards.

6. Class/Session Notes & Programmes

- Individual client session notes and training plans are stored digitally and, where applicable, in hard copy format in secure storage.
 - These are only accessed by Lush Fitness staff for relevant training and support.
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7. Photography & Videos

Photos or videos may be used for marketing or tracking client progress **only with your prior written consent**.

- Marketing images are stored for the duration of the campaign or until removal is requested.

- Progress images/videos are stored on your personal file and deleted from devices after use.
 - Photos requested by clients will be taken on their device where possible or deleted after being added to their file.
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8. Testimonials

Testimonials may be requested for promotional purposes with your consent and stored indefinitely unless a specific removal timeframe is agreed upon or requested by you.

9. New Enquiries & Waiting Lists

- Name, contact info, date of enquiry
 - Type of training requested
 - Summary of relevant medical background
 - Appointment notes (if applicable)
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10. Your Rights Under UK GDPR

You have the right to:

- Access your personal data
- Request correction or deletion of inaccurate data
- Withdraw consent at any time
- Object to how your data is used
- Request data portability (in certain cases)

To exercise any of these rights, contact us via:

 **lushfitness@hotmail.co.uk**

 **07769 651899**

11. Data Controller

The Data Controller for Lush Fitness is:

Sarah Lush

Lush Fitness

Beckley, East Sussex, TN31

 www.lushfitness.co.uk

12. Policy Review

This policy is reviewed regularly and updated to remain compliant with UK GDPR and industry standards. The most up-to-date version is always available upon request and will be provided via email when significant changes are made.