

THE REFORMERY WARLEY

UK GDPR & DATA PROTECTION POLICY

Effective Date: 1 June 2026

Last Updated: 1 June 2026

1. Introduction

The Reformery Warley ("The Reformery Warley", "we", "our", "us") is committed to protecting the privacy, confidentiality and security of personal information entrusted to us by our clients, visitors, employees and business partners.

This policy explains how we collect, process, store, protect and manage personal information in accordance with:

- UK General Data Protection Regulation (UK GDPR)
- Data Protection Act 2018
- Privacy and Electronic Communications Regulations (PECR)
- Other applicable UK data protection legislation

We are committed to processing personal data fairly, lawfully, transparently and securely.

2. Data Controller

For the purposes of UK GDPR, The Reformery Warley is the Data Controller responsible for determining how personal information is collected and processed.

Contact Details

The Reformery Warley

Brentwood Hard Court Tennis
Childerditch Lane
Little Warley, Warley
Brentwood, Essex CM13 3FD

Telephone: 07500 276 079

Email: info@thereformerywarley.co.uk

Any questions regarding this policy or your personal information should be directed to the above contact details.

3. Categories of Personal Information We Process

Depending on your relationship with us, we may collect and process the following categories of personal information.

Personal Identification Data

- Full name
- Date of birth
- Gender (where voluntarily provided)

Contact Information

- Email address
- Telephone number
- Postal address
- Emergency contact details

Health & Fitness Information

To ensure the safe delivery of Pilates services, we may collect:

- Medical conditions
- Injury history
- Physical limitations
- Pregnancy status
- Exercise experience
- Health screening responses
- Other information relevant to exercise participation

Membership & Attendance Information

- Membership details
- Class bookings
- Attendance records
- Cancellation history
- Waitlist activity
- Purchase history

Financial Information

- Payment records
- Membership transactions
- Invoices and receipts

Please note that payment card information is processed securely by authorised third-party payment providers and is not stored by The Reformatory Warley.

Technical Information

When visiting our website or using our online services, we may collect:

- IP address
- Device information
- Browser type
- Website usage information
- Cookies and analytics data

4. Lawful Basis for Processing

We process personal information under one or more of the following lawful bases:

Contractual Necessity

Processing required to:

- Manage memberships
- Process bookings
- Deliver classes and services
- Administer client accounts

Legal Obligation

Processing required to:

- Comply with tax obligations
- Meet health and safety requirements
- Fulfil regulatory responsibilities

Legitimate Interests

Processing necessary for:

- Operating and improving our business
- Preventing fraud
- Maintaining security
- Providing customer support
- Managing bookings and attendance

Consent

Where required, we rely on consent for:

- Marketing communications
- Photography and media use
- Processing certain health information
- Optional surveys and promotions

Consent may be withdrawn at any time.

5. Special Category Health Data

As participation in Pilates involves physical activity, we may collect information relating to:

- Injuries
- Medical conditions
- Pregnancy
- Physical limitations
- Mobility concerns
- Rehabilitation requirements
- Other health matters relevant to safe participation

This information is classified as Special Category Data under UK GDPR.

We process this information solely to:

- Assess suitability for participation
- Ensure client safety
- Modify exercises where appropriate

- Meet health and safety obligations

Access to health information is restricted to authorised personnel who require it for legitimate business purposes.

6. How We Use Personal Information

We may use personal information to:

Deliver Services

- Manage bookings
- Administer memberships
- Schedule appointments
- Maintain attendance records

Ensure Safety

- Assess health questionnaires
- Monitor exercise suitability
- Respond to emergencies

Process Payments

- Manage transactions
- Maintain financial records
- Prevent fraud

Communicate With Clients

- Booking confirmations
- Waitlist notifications
- Service updates
- Customer support communications

Improve Business Operations

- Service development
- Website analytics
- Customer feedback

- Business planning

Comply With Legal Requirements

- Regulatory obligations
- Health and safety requirements
- Legal proceedings where required

7. Third-Party Service Providers

The Reformatory Warley works with carefully selected third-party providers to support the operation of our business.

These providers may include:

Booking & Membership Platforms

Used to manage:

- Class bookings
- Memberships
- Attendance records
- Client communications

Payment Processors

Used to:

- Process payments securely
- Manage subscriptions
- Prevent fraudulent transactions

Website & Technology Providers

Used for:

- Website hosting
- Analytics
- Cloud storage
- Email communications
- Customer relationship management systems

Professional Advisers

Including:

- Accountants
- Solicitors
- Insurance providers
- Regulatory consultants

All third-party providers are required to maintain appropriate security measures and comply with applicable data protection legislation.

8. International Data Transfers

Some third-party technology providers may store or process data outside the United Kingdom.

Where international transfers occur, we will ensure appropriate safeguards are implemented, including:

- UK adequacy regulations
- Standard Contractual Clauses
- Other legally recognised transfer mechanisms

9. Data Security

The Reformery Warley takes appropriate technical and organisational measures to protect personal information against:

- Unauthorised access
- Accidental loss
- Destruction
- Alteration
- Disclosure
- Misuse

Security measures may include:

- Password-protected systems
- Secure cloud storage

- Access controls
- Staff training
- Software security updates

Although every effort is made to protect information, no electronic system can guarantee absolute security.

10. Data Retention

Personal information will only be retained for as long as necessary to:

- Fulfil the purposes for which it was collected
- Meet legal obligations
- Resolve disputes
- Enforce agreements

Retention periods may vary depending upon:

- Membership status
- Financial record requirements
- Health and safety obligations
- Regulatory requirements

Once information is no longer required, it will be securely deleted or anonymised.

11. Individual Rights

Under UK GDPR, you have the right to:

Right of Access

Request access to personal information held about you.

Right to Rectification

Request correction of inaccurate or incomplete information.

Right to Erasure

Request deletion of personal information where legally applicable.

Right to Restrict Processing

Request that processing be limited under certain circumstances.

Right to Object

Object to certain forms of processing, including direct marketing.

Right to Data Portability

Request transfer of your personal information where applicable.

Right to Withdraw Consent

Withdraw consent at any time where processing is based on consent.

Requests should be submitted to:

info@thereformerywarley.co.uk

We may require proof of identity before fulfilling requests.

12. Data Breaches

In the event of a personal data breach, The Reformery Warley will:

- Investigate the incident promptly
- Take appropriate remedial action
- Notify affected individuals where required
- Report the breach to the Information Commissioner's Office (ICO) where legally required

13. Complaints

We encourage individuals to contact us directly if they have concerns regarding how personal information has been handled.

Complaints should be directed to:

Email: info@thereformerywarley.co.uk

If you remain dissatisfied, you may lodge a complaint with:

Information Commissioner's Office (ICO)

Website: <https://www.ico.org.uk>

14. Policy Review & Updates

The Reformery Warley reserves the right to amend this policy from time to time to reflect changes in legislation, business practices or operational requirements.

The most recent version of this policy will always be available upon request and, where applicable, published through our website and booking systems.

15. Contact Us

For any questions regarding this UK GDPR & Data Protection Policy, please contact:

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