



PRIME PERFORMANCE PRIVACY and CCTV USAGE POLICY

This website is operated by Prime Performance Limited, a company incorporated in the Isle of Man. In this Policy, “the business”, “we”, “us” and “our” refers to Prime Performance Limited. The terms “you” and “your” includes our customers/clients, business partners and users of our website(s).

PERSONAL DATA

This website collects personal data from users and visitors, and we would recommend you read this privacy policy carefully as it contains important information on who we are, and how and why we collect, store, use and share your personal data. It also explains your rights in relation to your personal data and how to contact us or supervisory authorities in the event you have a complaint.

Personal data is defined as any information that can identify an individual, either directly or when combined with other data as well as data concerning health, sex life or sexual orientation. The Data subject is the individual that the personal data relates to.

We collect, use, and retain certain personal data about you subject to the Isle of Man Data Protection Act 2018 and/or the United Kingdom General Data Protection Regulation (UK GDPR). This personal data enables us to provide services to you. If you do not provide personal data we ask for, it may delay or prevent us from providing these services to you.

The table below outlines the types of personal data we collect, how and why we collect your personal data and what we, and third parties will use your data for:

WHAT WE COLLECT	HOW WE COLLECT IT	WHY WE COLLECT YOUR PERSONAL DATA	WHAT WE (AND THIRD PARTIES) USE YOUR PERSONAL DATA FOR	WHO WE MAY SHARE YOUR PERSONAL DATA WITH
Name Contact information Physical address Email address Telephone number Gender Location Billing address Transaction information Card payment information Personal and professional interests Social presence (e.g. LinkedIn, Facebook) Contact history Transaction history Information from external accounts Credit and KYC checks Browsing patterns Responses to surveys Special category personal data	Directly from you (telephone, text, email) and via our website. In addition we may collect information from your credit reference agencies, due diligent providers, sanctions screening providers, third parties, website cookies, IT systems.	Your personal data can only be used if there is a valid reason and in the following circumstances: - to comply with regulatory obligations - where you have given your consent - the execution and pre-requisites of a contract with you - our legitimate interests - a third parties legitimate interests	To create and manage your account with us To improve our services Preventing and detecting fraud against you or us Providing services to you Auditing Investigations Regulation Legal requirements Compliance Privacy Analysis Security Statutory requirements Marketing Credit checks	Regulators Credit reference agencies Insurers Banks Social media platforms Marketing agencies Law enforcement agencies Regulatory bodies Auditors Service providers

If you would like more information about who we share our data with and why, please contact us (see ‘How to contact us’ below).

We take all reasonable precautions to ensure Third parties take appropriate measures to protect your personal data. It may be necessary for us to share your personal data with Third parties outside the Isle of Man and UK if you are based outside the Isle of Man and UK or where there is an international requirement to the services, we are providing to you.

Under data protection law, we can only transfer your personal data to a country or international organisation outside the Isle of Man and the UK where:

- the UK government has decided the country or international organisation has an adequate level of protection of personal data (known as an ‘adequacy decision’). For a list of the current UK Data partnerships please see [UK adequacy approved countries](#)
- there are appropriate safeguards in place, together with enforceable rights and effective legal remedies for data subjects. Other countries or international organisations we are likely to transfer personal data to do not have the benefit of an adequacy decision. This does not necessarily mean they provide poor protection for personal data, but we must look at alternative grounds for transferring the personal data, such as ensuring appropriate safeguards are in place or relying on an exception. A specific exception applies under data protection law e.g. you have explicitly consented to the proposed



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transfer after having been informed of the possible risks and/or the transfer is necessary to establish, exercise or defend legal claims

Your Personal data may be held at our offices, Third party agencies, service providers, representatives and agents and will be kept for as long as you have an account with us or we are providing services to you. Once you terminate your account with us or there is a period of 12 months of no activity on the account then we will keep your personal data for as long as is necessary:

- to respond to any questions, complaints or claims made by you or on your behalf
- to show that we treated you fairly
- to keep records required by regulation and law.

We will not keep your personal data for longer than necessary and when it is no longer necessary to keep your personal data, we will delete or anonymise it.

MARKETING

We, and Third parties may use your data for marketing purposes. You have the right to opt out of receiving marketing communications at any time by:

- contacting us (see **'How to contact us'** below)
- using the 'unsubscribe' link in emails or 'STOP' number in texts
- by clicking on the 'Manage Consent' icon at the bottom left of any page on our site

You have the following rights, which you can exercise free of charge:

Access	The right to be provided with a copy of your personal data.
Reflection	The right to require us to correct any mistakes in your personal data.
Erasure	The right to require us to delete your personal data - in certain situations.
Restriction of processing	The right to require us to restrict processing of your personal data in certain circumstances e.g. if you contest the accuracy of the data.
Data portability	The right to receive the personal data you provided to us, in a structured, commonly used and machine readable format and/or transmit that data to a third party in certain situations.
To object	The right to object at any time to your personal data being processed for direct marketing (including profile) and, in certain other situations to our continued processing of your personal data, e.g. processing carried out for the purpose of our legitimate interests.
Not to be subject to automated individual decision making	The right to not be subject to a decision based solely on automated processing (including profiling) that produces legal effects concerning you or similarly significantly affects you.

For further information on each of those rights, including the circumstances in which they apply, please see the Isle of Man Information Commissioner's website at <https://www.inforights.im/individuals/data-protection/your-data-protection-rights/> or [Guidance from the UK Information Commissioner's Office \(ICO\) on individuals' rights.](#)

If you would like to exercise any of these rights, please contact us (see **'How to contact us'** below)



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We have implemented appropriate security measures to prevent personal data from being accidentally lost, used, or accessed unlawfully. We limit access to your personal data to those who have a genuine business need to access it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

To ensure you are protecting your information please visit [Get safe online](#). Get Safe Online is supported by HM Government and leading businesses.

You also have the right to lodge a complaint with the Isle of Man Information Commissioner, the UK Information Commissioner, or any relevant European data protection supervisory authority. The Isle of Man Information Commissioner may be contacted at <https://www.inforights.im/contact-us/> or telephone +44 1624 693260 and UK Information Commissioner may be contacted at <https://ico.org.uk/make-a-complaint> or telephone: 0303 123 1113.

The use of closed-circuit television (CCTV) to comply with the GDPR

1. The images obtained from the system which include recognisable individuals are personal data and are covered by the applicable Data Protection legislation. This Policy should therefore be read in conjunction with the Prime Performance Privacy Policy which is available on the Prime Performance website.
2. CCTV systems are operated throughout the gym, monitoring dedicated areas deemed necessary by Prime Performance.
3. Use of a surveillance camera system must always be for a specified purpose which is in pursuit of a legitimate aim and necessary to meet an identified pressing need. This includes giving confidence to staff and visitors that they are in a safe and secure environment, protecting the integrity of the site by deterring criminals and to provide evidence to assist with the detection and prosecution of criminal offences.
4. When deciding to use CCTV in a certain area Prime Performance must take into account its effect on individuals and their privacy and perform regular reviews to ensure its use remains justified.
5. Prime Performance will be transparent in the use of a surveillance camera system, provide a CCTV notice, which could be an image, and publicise a contact point on the website for access to information and complaints in line with our Data Protection Policy.
6. Prime Performance is the Data Controller for the Personal Data captured by our CCTV systems.
7. The CCTV systems which are under Prime Performance's control are managed by the Gym Manager. The recordings are confidential and available only to those directly connected with operating the system. Copies of recorded information are strictly controlled and only made in relation to incidents under specific restrictions and require the approval described in point 10.
8. The Gym Manager will produce and communicate clear rules and procedures with regards to operating, processing, and releasing CCTV images.
9. No more images and information should be stored than that which is strictly required for the stated purpose of a surveillance camera system, and such images and information should be deleted once their purposes have been discharged.
10. Access to retained images and information should be referred to the Gym Manager and there must be clearly defined rules on who can gain access and for what purpose such access is granted; the disclosure of images and information should only take place when it is necessary for such a purpose or for law enforcement purpose and always require previous written approval of the Gym Manager.
11. Surveillance camera system images and information should be subject to appropriate security measures to safeguard against unauthorised access and use.
12. There should be effective and periodic review mechanisms to ensure legal requirements, policies and standards are complied with in practice and to ensure that the system is working properly and produces the required images.



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HOW TO CONTACT US

Please contact us if you have any questions about this policy, the information we hold about you, or if you would like further information about data transferred outside the Isle of Man and the UK.

If you wish to contact us, please send an email to info@primeperformance.im or write to us at our business address: Prime Performance Limited, Victory House, Prospect Hill, Douglas, Isle of Man, IM1 1EQ.

DO YOU NEED EXTRA HELP?

If you would like this notice in another format (for example audio, large print, braille) please contact us (see 'How to contact us' above).