

POLITICA DE PROTECCIÓN DE DATOS Non-suscribers

This personal data protection policy establishes the bases on which we process the personal data provided by people who, not being subscribers, have any contact with us for the timely provision of services or who are interested in our services (people who promptly access to the centre with an invitation or pay a specific entrance; potential clients who request information about our services; contracting services as non-subscribers, ...).

Who is responsible for the processing of your data?

The company that manages the sports centre to which you go will be responsible (to request information about our services, to access as a guest or with punctual access ...): consult the company and its address [here](#) (also referred to as "DiR", "we" or "our").

If you have any questions, requests or concerns about the treatment we do of your personal data, please contact our Data Protection Officer at dadespersonals@dir.cat.

What personal data do we process?

When we indicate that we will process your personal data, we mean any information or data that allows you to be identified, either directly (e.g., your first and last name), or indirectly (e.g., your telephone number).

The personal data that we process will be those that you provide us directly through the reception or the forms enabled for this purpose. We will process your identification data, contact details, date of birth, origin of the contact, centre of interest, repository of contractual documentation, record of incidents, history of relationships, services provided, and communications maintained as well as, where appropriate, the registry of accesses, registry of payments and receipts, mainly.

Likewise, information considered a special category of data may be processed according to the regulations, requiring your explicit consent to said treatment, in particular:

- Your biometric data related to your fingerprint or facial recognition in order to enable access to the facilities.
- Your biometric digital signature data obtained by signing the contractual documentation at the reception of the centres.
- Your health data that you can provide us when contracting certain services that require access to health information for an adequate provision of them (e.g. nutrition service, certain aesthetic services with appliances, physiotherapy service or osteopathy, personal training services).

For what purposes do we process your personal data?

The data is processed for the following purposes:

- **Customer service:** to attend to inquiries, requests for information, claims and suggestions that may be presented to us, and to manage and monitor incidents, complaints and reports that may be related to any of our services, products, prices and promotions, among others.
- **Celebration and management of the contractual relationship:** for the general management of the celebration, maintenance and loyalty of the contractual relationship derived from the services contracted as a non-subscriber, including, among other purposes, the management of access as a guest, with a specific entry or as a user of services provided within our centres without being a subscriber to the centre. This purpose includes the management and registration of access through biometrics, the management and delivery of contractual documentation, management of payments and direct debits (including charges and credits), digitalization of contractual documentation, monitoring and management of defaults and debts; as well as the management of the non-client area of the website and/or mobile applications.

- **Commercial, promotional and marketing activities:** we may contact you to carry out commercial monitoring and promote our services, products and investment opportunities, as well as our franchised centres and third parties with whom we have signed a collaboration agreement. Contact for these purposes can be made through any existing communication channel: mainly through email, phone calls, messaging services (including SMS and push notifications in the app), social networks and postal mail.

Also, they will try to manage your participation in events and promotional events that we organize or in which we participate and you have registered. These events may be recorded and photographed by DiR and promotional materials for commercial purposes are prepared and published. Therefore, attendance at any event implies express authorization to record the image and/or voice of the attendees for this purpose.

In accordance with the Information Society Services Law (LSSI), commercial communications will only be sent to you by electronic means if you have expressly consented to such sending. In case you have expressly consented to the sending of commercial communications, we inform you that you can unsubscribe from this type of communication, following the instructions that appear at the end of our emails.

- **Modelling a commercial profile:** we may collect and analyse your personal data to evaluate certain personal aspects, in particular to analyse or predict aspects related to your personal preferences, interests, economic situation, behaviour, location or relationships with other users and based on this Analysis we will send or show you advertising communications or adapted content. This treatment is also known as profiling, and ultimately consists of categorizing a person based on their own characteristics based on the automated treatment of their personal data. It is commonly used in marketing actions and is practical to identify the consumer profile or define the target of an advertising campaign.

We remind you that you have the right to object to your data being used to prepare a profile, in the terms that are reported later in the section on the rights that assist you.

In no case will we use this profile to make decisions that are based solely on the automated processing of your data and that have legal effects on you or that significantly affect you in a similar way (e.g., deny the contract of services online in which there is no human intervention).

- **Use of Facebook Custom Audiences advertising tools (“Facebook adapted audiences”):** We use the Facebook Custom Audiences application (“Facebook adapted audiences”), based on the consent given for the communication of personalized offers and adapted content to the user profile.

This service works as follows:

1. We load your email address, which we have obtained from you when you have shown your interest by knowing the available rates or more information about our centres.
2. Facebook makes a comparison between your email address and your user base and determines if you are a Facebook user.
3. If you are not a Facebook user, nothing happens with your email address and Facebook does not do any activity with it.
4. If you are a Facebook user, Facebook itself will add you to the list of a new personalized audience, to which we can only send personalized advertising.
5. Thanks to this we will be able to show you more focused and personalized ads on Facebook, and especially additional discounts.

In any case, you can object to this treatment at any time by writing a request to the email address dadespersonals@dir.cat.

- **Analysis and improvement of services and products:** in order to better understand the needs and expectations of users and in order to improve our customer service, our services and products, we may send you satisfaction and quality surveys as well as perform statistics and analysis market (these will allow us to know, for example, the reaction of users to our advertising campaigns), and to analyse the responses you have given us to these surveys (they are not anonymous) and to be able to contact you to deal with any matter related to them.

- **Compliance with legal obligations and internal policies:** there may be regulations that force the retention of personal data for the fulfilment of certain legal obligations or for the attention of responsibilities. For example, the General Data Protection Regulation enables you to keep the personal data of those people who have exercised their right of deletion blocked during the period in which responsibilities may be derived and this in order to be able to formulate, exercise or defend themselves against claims. . Likewise, your data may be kept in order to prevent us from sending you commercial communications if you have requested not to continue receiving them. They will also be treated in order to control compliance with our internal policies and regulations and manage any incident or claim regarding compliance with the regulations that apply to it.

How long do we keep your data for?

The personal data provided will be kept for the time necessary for the purpose for which we treat your data, to meet your requests or needs, as well as to comply with our legal and regulatory obligations and the defence of our interests (e.g. for our defence in court) or for statistical or historical purposes.

The criteria for determining the retention period of your personal data is as follows:

- Personal data obtained when contracting our services: while our contractual relationship lasts;
- Personal data obtained when contacting us for a consultation: for the time necessary to answer your query;
- Personal data obtained by creating an online account (on-line procedures): until you ask us to delete it or after a period of inactivity (without active interaction with us) we can automatically delete it;
- Personal data obtained by giving your consent to send commercial communications: until you cancel the subscription, require us to delete it or after a period of inactivity (without active interaction with us);

What is the legitimacy for the treatment of your data?

The legal basis for the treatment of your personal data may be:

- Your **consent** (for example, sending commercial communications, sending quality surveys, personalized advertising);
- Our **legitimate interest**, which can be:
 - Statistics: to help us better understand your needs and expectations and therefore improve our services, websites / applications / devices, products and brands.
 - Profiling.
 - Offer you our customer service.
 - Communication to group companies and affiliated entities for administrative and user management purposes.
 - Video surveillance and access control.
- The **execution of a contract:** perform the services you request from us;
- Compliance with **legal obligations** that involve the processing of personal data (for example, billing).

To which recipients will your data be communicated? Is there an international transfer?

Your personal data may be communicated:

- To companies of **the DiR business group** and **franchised centres** for administrative and user management purposes, as well as (if you have given prior consent) for commercial, promotional and marketing purposes and for the analysis and improvement of services. We have a global corporate tool for managing the user database, accessible by all centres that operate under the DiR brand. This will allow you, among others, to access the DiR network of centres without having to provide your personal data again in each centre where you request information or want to access. You can consult the companies of the DiR group and franchises [here](#).

- To any third party that accesses the media, both online and offline, including the Internet, when participating in **activities, courses or any other type of social or sports event** organized or participated by us. These events can be recorded on video or photographed so that your image can be captured and later disseminated for promotional purposes, to publicize our events. The same will happen if you participate in races or sports tournaments that we organize, in which it will be possible to disseminate your identification data as a participant (eg your personal brand in a race or your crossing with other participants in a tournament table).
- To the **competent authorities for compliance with legal obligations** (eg, courts and tribunals, public administrations with jurisdiction in the matter).
- To **third party service providers to DiR**, This communication is necessary only to the extent that they allow DiR to fulfill the purposes of the treatment, and they cannot use them for any other purpose (eg, system service providers - ICT).

Your personal data may be processed or stored in countries other than those of the European Economic Area (EEA), depending on where our service providers are located. Data is only transferred outside the EEA if it offers comparable guarantees.

What are your rights regarding the processing of your data?

The data protection regulations grant you rights in order to have control over your data, and that you can exercise at any time by sending an email to dadespersonals@dir.cat or in writing to Gestora Clubs DiR, SL, c / industry, 90-92, entlo. 6th to the attention of Legal Advice. To process your request, we may ask you to prove your identity.

You have the following rights:

Your rights	What does it mean?
Right to Information	You have the right to obtain clear, transparent and understandable information about the way we use your personal data and about your rights. We provide you with such information in this Policy.
Right of access	You have the right to know whether or not your personal data is being processed and in such case, to know the purposes for which it is processed, category of data, recipients, retention period, and the rights that concern you, among others. A fee may be charged for administrative costs.
Right of rectification	You have the right to have your personal data rectified when it is inaccurate or no longer valid or to have it completed when it is incomplete.
Right to erasure (right to be forgotten)	In certain cases, you have the right to have your personal data erased or deleted. It should be noted that this is not an absolute right, since we may have legal or legitimate reasons to keep them.
Right to the limitation of the treatment	You have the right to request the limitation of the treatment of your data (we can store them but we will not be able to continue using or treating them) in certain circumstances provided by the General Data Protection Regulation: <ul style="list-style-type: none"> • that the interested party challenges the accuracy of the personal data, during the period that allows the person in charge to verify their accuracy; • that the treatment is illegal and the interested party opposes the deletion of personal data and instead requests the limitation of its use; • that the controller no longer needs the personal data for the purposes of the treatment, but the interested party needs them for the formulation, exercise or defence of claims; • that the interested party has opposed the treatment pursuant to article 21, paragraph 1, while verifying if the legitimate reasons of the controller prevail over those of the interested party.

Right to data portability	You have the right to transfer, copy or transfer data from our database to a different one. It is only possible to exercise this right with respect to data that you have provided, when the treatment is based on the execution of a contract or on your consent and the treatment is carried out by automated means.
Right to oppose the treatment	You have the right to object to the processing of your data when it is based on the satisfaction of legitimate interests, including profiling and direct marketing.
Right to withdraw consent	You have the right to revoke the consent that you have previously given for the treatment based on this consent. The withdrawal of consent will not affect the lawfulness of the treatment based on the consent prior to its withdrawal.
Right to file a claim with a supervisory authority	You have the right to claim in front of the Data Protection Authorities if you consider that your rights in relation to the protection of personal data have been violated (www.agpd.es).

What is the treatment of your data in DiR profiles on social networks?

We have a presence on social networks and we can process personal data of people who follow us on social networks or carry out any connection action through them.

You must take into account that any information that you publish through the profiles on the social networks that we manage will become public information and will be available to their visitors and the general public. This means that any user located in any country in the world and with a universal character, will be able to access their information. In this sense, you must take special care and diligence when disclosing personal information on these sites. Also note that the privacy policy of the corresponding social network will apply.

Your personal data provided in the social networks that we manage will be processed by it with the following purposes: (i) allow access and navigation to the content and services offered through said social networks (ii) allow and manage participation in contests, promotions, raffles or any other initiatives that we carry out and manage the promotion of winners, as well as the delivery of possible prizes (iii) allow the sending of information, commercial communications related to our services and activities, as well as personalized advertising (iv) to contact you in the event of any manifestation, complaint or claim of our services and to manage the complaints received from third parties for abuse (v) to moderate the uses, which in your case, in our social networks.

Data processing of MINORS

The treatment of personal data of users under the age of 16 will be carried out in accordance with the consents or authorizations of the holders of parental authority or guardianship of the child. DiR will make reasonable efforts to verify that consent has been given by the holder of parental authority or guardianship over the child.

The personal data of the holders of parental authority or guardianship of the child will be treated in order to manage such authorizations and, where appropriate, contact you in relation to any matter related to the status of user of the child.

Updates to this policy

We may modify this privacy policy. The legend "Effective Date" at the bottom of this policy indicates when it was last revised. The changes will take effect once the Privacy Policy is published.

Effective Date: June 30, 2020