

# DATA PROTECTION POLICY

THINKOFIT Ltd

## Document Control

Version	Date	Amended By	Summary of Changes
1.0	03/03/2026	Anthony Dias	Initial Issue

# THINKOFIT Ltd

## DATA PROTECTION POLICY

### Policy Statement

Thinkofit Ltd is committed to protecting the privacy and personal data of employees, clients, contractors, visitors, and any other individuals whose data we process.

We (Thinkofit Ltd) comply with:

- UK GDPR
- Data Protection Act 2018
- Privacy and Electronic Communications Regulations (PECR)
- Human Rights Act 1998
- ICO CCTV Code of Practice

### Scope

This policy applies to all employees, visitors, contractors, systems, paper records, IT systems, cloud services and CCTV systems.

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## **Data Protection Principles**

Thinkofit Ltd adheres to the seven UK GDPR principles:

1. Lawfulness, fairness and transparency
2. Purpose limitation
3. Data minimisation
4. Accuracy
5. Storage limitation
6. Integrity and confidentiality
7. Accountability

## **Lawful Basis for Processing**

We process data under:

- Consent
- Contractual necessity
- Legal obligation
- Legitimate interests
- Vital interests
- Public task (where applicable)

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## **Data We Collect**

- Name and contact details
- Date of birth
- Payment information
- Employment details
- Email address
- Health/fitness data (where relevant)
- CCTV images
- Website usage data

## **Consent**

Where required, consent is freely given, specific, informed and unambiguous. Individuals may withdraw consent at any time and have the right to be forgotten. Individuals can also request access to any data which we hold via a Subject Access Request (SAR).

## **Data Usage**

Data is used for service delivery, payment processing, legal compliance, security, and marketing (with consent).

## **Data Sharing**

Data may be shared with professional advisers, IT providers, regulators and law enforcement where legally required.

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## Data Security

Security measures include password protection, encryption, restricted access, secure storage and staff training.

Data breaches will be reported to the ICO within 72 hours where required.

## Data Retention

Data is retained only as long as necessary for legal, contractual or business purposes.

## Individual Rights

Individuals have the right to access, rectification, erasure, restriction, portability, objection and rights regarding automated decision-making.

## CCTV Policy

**Purpose:** We use CCTV as a strategy for crime prevention, safety, property protection and incident investigation.

**Legal Basis:** We only use CCTV for crime prevention, safety, property protection and incident investigation. We do not use CCTV for personal reasons or for any reason not mentioned in our purpose.

**Transparency:** Clear signage will be displayed to ensure staff, visitors and contractors are aware that CCTV is being used to ensure transparent practice.

**Access:** Restricted to authorised personnel and agencies such as the Police upon request to maintain safety, to aid incident investigation or when damage or theft to property has occurred.

**Retention:** Maximum 30 days unless required for investigation.

**Security:** Password protected and secure storage. Data is classified and only accessible to regulators, agencies and personnel within with authorisation. All

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THINKOFIT personnel accessing data are subject to Enhanced DBS and are not permitted to access any sensitive data without a satisfactory Enhanced DBS. Individuals are not authorised to handle any data with a basic or Standard level DBS.

**Policy Review**

This policy will be reviewed annually on 3<sup>rd</sup> of March.

**Next policy review:** 03/03/2027

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