



Ixion Group

**Data Protection: Access by
Customers to personal Data
Policy**

INTRODUCTION

The Ixion Group of companies (Ixion) fully respects your right to privacy. However in order for us to carry out our business, we need to collect, use, and keep personal data on our customers (data subjects).

The Data Protection Act 1998 (the 'Act') regulates the way in which certain information about data subjects is held and used. We at Ixion fully accept our responsibilities and adhere to all UK data protection and freedom of information legislation.

Ixion Holdings Ltd acquired Computer Gym (UK) Limited - now called Ixion CG Limited - in April 2010, and is actively working towards implementing this policy throughout this multi-site company.

DEFINITION OF PERSONAL DATA

Personal data is defined by the Act as data which relates to a living individual who can be identified from that data, or from that data and other information which is held by the company.

The Act also defines "sensitive personal data" as personal data relating to the racial or ethnic origin of the data subject; their political opinions; their religious (or similar) beliefs; trade union membership; their physical or mental health condition; their sexual life; the commission or alleged commission by them of any offence; or any proceedings for any offence committed by them, the disposal of such proceedings or the sentence of any court in such proceedings.

RIGHTS OF DATA SUBJECTS

Under the Act, data subjects have the following rights:

- To be informed that their personal data is being processed;
- To access any of their personal data held by the Company within 40 days of making a request;
- To prevent the processing of their personal data in limited circumstances; and
- To rectify, block, erase or destroy incorrect personal data.

PRINCIPLES OF DATA PROTECTION

Any personal data which Ixion collects, records or uses in any way – whether it is held on paper, on computer or other media – will have appropriate safeguards in place to ensure that Ixion complies with the Act. Ixion fully endorses and adheres to the eight principles of the Act, which state that personal data:

1. Must be processed fairly and lawfully (and shall not be processed unless certain conditions are met);

2. Must be obtained only for specified and lawful purposes;
3. Must be adequate, relevant and not excessive with respect to the purposes for which it is processed;
4. Must be accurate and, where appropriate, kept up to date;
5. Must be kept for no longer than is necessary in light of the purpose(s) for which it is processed;
6. Must be processed in line with your rights;
7. Must be secure so that it is protected against unauthorised or unlawful processing, accidental loss, destruction or damage; and
8. Must not be transferred to a country or territory outside of the European Economic Area without adequate protection.

OUR DUTY TO YOU

When we collect any personal data from you, we will inform you why we are collecting your data and what we intend to use it for.

We also have a responsible marketing policy, and do not give details of our customers or related individuals to any other company. We may contact customers by email, mail or telephone with details of our own products and services. If you do not wish to be contacted for this purpose, please write to the Data Controller at Ixion Holdings Limited, Alexandra House, 36a Church Street, Great Baddow, CM2 7HY or Ixion CG Limited, Felix House, 85 East Street, Epsom, Surrey KT17 1DT.

Under the Act, any individual may write to the Data Controller at the above address, and request a copy of the information we hold on them. This request must include sufficient detail to enable the data to be identified, and a fee of £10 paid in advance.

Upon receipt of your request we have a maximum period of 40 days within which to respond. The following information will be provided to you:

- Whether or not the Company holds any personal data on you;
- A description of any personal data held on you;
- Details of what that personal data is used for;
- Details of any third-party organisations that the data has been passed to; and
- Details of any technical terminology or codes.

RESPONSIBILITY FOR IMPLEMENTATION OF THIS POLICY

The people responsible for data protection in the Ixion Group are the Data Controllers: Chris Adams who is based at Ixion Holdings in Chelmsford, and Pat Phillips who is based at Ixion CG in Epsom.

If you have any queries or concerns, please contact Chris Adams at Chelmsford on 01245 241442, or Pat Phillips at Epsom on 0844 800885.

RESPONSIBILITY FOR MONITORING THIS POLICY

This policy will be reviewed annually (or more frequently, if legislation and/or best practice make it necessary) by the Data Controllers in order to ensure its continuing relevance.

The Group CEO is responsible to the Ixion Holdings Board for the policy.

Any changes to the policy will be communicated to all customers on programme and employees.

DATA PROTECTION REGISTER

As we are a Company that processes personal data, we are required to be registered with the Information Commissioner's Office, which is an independent authority that regulates and enforces the Act.

All companies must renew their notification with the Information Commissioner's Office on an annual basis. Failure to notify constitutes a criminal offence.

It is our Data Controller's responsibility for the annual renewal. Our Data Protection Register numbers are as follows:

Ixion Holdings:	Z9405579
Ixion CG:	Z7705560