



Privacy Policy

Granite Leisure Limited · graniteleisure.com and our health clubs, spas and lidos

Version 2.0 · Last updated 9 October 2026

1. Who we are

Granite Leisure Limited ("Granite Leisure", "we", "us") operates health clubs, spas and lidos across the UK, many of them within partner hotels. The current list of our sites is on graniteleisure.com. This policy applies to all of them.

We are the data controller for the personal data described in this policy. Our details are:

- Granite Leisure Limited, registered in Scotland, registered office 12–16 Corbiehall, Bo'ness, EH51 0AP
- Company number: SC789536
- ICO data protection registration number: ZB832017
- Privacy contact: doni@graniteleisure.com

We do not have a statutory Data Protection Officer. Our Company Director, Doni Thomson, is responsible for data protection and for responding to requests about your personal data.

2. Who this policy covers

This policy applies to members, day-pass and session customers, people who enquire about joining, guests of our hotel partners who use our facilities, visitors to our websites and social media pages, and people who contact us. Job applicants and staff are covered by a separate privacy notice provided during recruitment and employment.

3. The personal data we collect

Category	Examples	Where it comes from
Identity and contact	Name, date of birth, address, email, phone numbers, photograph (if you add one to your account or membership card)	You, when you register, join or book
Emergency contact	Name and phone number of the person you nominate	You
Membership and booking	Membership type and number, passes and credits purchased, sessions booked, check-ins and attendance, cancellations and freezes	You and our booking system
Payment	Direct Debit mandate details and payment history; for card payments, a tokenised card reference and the last four digits — we never hold full card numbers	You, our booking platform's payment processor and our Direct Debit provider
Health questionnaire (PAR-Q)	Your answers to the physical activity readiness questionnaire and any medical information you choose to give us so we can keep you safe	You

Category	Examples	Where it comes from
Communications	Emails, messages through our booking app, web enquiries, social media messages, complaints and our replies, and notes we make about them	You and our staff
Marketing preferences	Whether you have said yes or no to email and SMS marketing	You
Images	CCTV at all of our sites; photographs or video taken at events, with notice	Our CCTV systems and our staff
Website and app usage	IP address, device and browser type, pages visited, cookies (see section 12)	Your device
Children	For junior members and children on family memberships: name, date of birth and the details of the parent or guardian who holds the account	The parent or guardian

We do not knowingly collect personal data directly from children under 16. Junior memberships and children's passes must be set up by a parent or guardian, who is the account holder.

4. Why we use your data and our lawful basis

Purpose	Lawful basis (UK GDPR Article 6)
Setting up and running your membership, selling passes, taking bookings and admitting you to our sites	Contract — Article 6(1)(b)
Taking payments, processing refunds and keeping financial records	Contract — Article 6(1)(b); legal obligation — Article 6(1)(c)
Health and safety: PAR-Q screening, emergency contact, lifeguarding and incident records	Legitimate interests (keeping you safe) — Article 6(1)(f); legal obligation — Article 6(1)(c). For health information, your explicit consent — Article 9(2)(a) — or, in an emergency, protection of vital interests — Article 9(2)(c)
Responding to enquiries, messages and complaints, and keeping records of how we handled them	Legitimate interests — Article 6(1)(f)
Service messages about your membership or booking (confirmations, reminders, changes to opening times, incidents affecting your visit)	Contract — Article 6(1)(b)
Email and SMS marketing about our clubs, offers and events	Your consent — Article 6(1)(a). You can withdraw it at any time (section 7)
CCTV for the safety of customers and staff and the prevention of crime	Legitimate interests — Article 6(1)(f)
Running our websites and understanding how they are used	Legitimate interests — Article 6(1)(f); consent for non-essential cookies
Establishing, exercising or defending legal claims, and responding to regulators	Legitimate interests — Article 6(1)(f); legal obligation — Article 6(1)(c)

We do not use automated decision-making or profiling that produces legal or similarly significant effects about you.

5. Who we share your data with

We use a small number of trusted suppliers who process personal data on our behalf under written contracts. They may only use your data to provide services to us.

Supplier	What they do for us
Club Right Ltd (ClubRight)	Our membership, booking, check-in, messaging and payment platform, including ClubRight Pay for card payments
London & Zurich	Collecting membership Direct Debits
Google LLC (Google Workspace)	Email, documents and file storage
Our website host and web agency	Hosting and maintaining graniteleisure.com and club websites
Google (Tag Manager and Analytics)	Website analytics, subject to your cookie choices
Meta (Facebook and Instagram) and our social media tools	Social media pages and messaging, where you contact us that way

We may also share personal data with:

- **Our hotel partners.** Where a club is located within a hotel, we share the minimum needed to let hotel guests use the facilities and to deal with incidents or complaints that involve the hotel. We do not share member lists with hotel operators for their own marketing.
- **Emergency services and medical staff,** if you are taken ill or injured on our premises.
- **Our insurers, legal advisers and auditors,** where necessary to deal with a claim or to meet our legal obligations.
- **Regulators and law enforcement,** such as the Information Commissioner's Office, local authorities or the police, where the law requires it.

We do not sell personal data and we do not share it with third parties for their own marketing.

6. International transfers

Your data is stored in the United Kingdom. Some of our suppliers (for example Google and Meta) may process data in the European Economic Area or the United States. Where that happens, the transfer is protected by the UK International Data Transfer Addendum, the UK–US Data Bridge, or a UK adequacy decision.

7. Marketing

We will only send you marketing by email or SMS if you have told us you want it. You can change your mind at any time by using the unsubscribe link in any marketing email, by updating your preferences in your online account or the ClubRight app, or by emailing doni@graniteleisure.com. Our booking platform blocks marketing messages to anyone whose preference is set to "no". Service messages about your membership or a booking you have made are not marketing and will continue while you are a customer.

8. How long we keep your data

Record	How long
Membership and customer account, bookings, passes and attendance	For the life of your account and six years after it closes, for tax, accounting and legal reasons

Record	How long
Payment and refund records	Six years from the end of the financial year in which the payment was made
PAR-Q and health information	For the life of your membership and 12 months after it ends, then deleted
Emergency contact	Deleted when your account closes
Enquiries from people who do not join	12 months from the last contact
Complaints and the correspondence about them	Six years from closure of the complaint
Data subject requests and our responses	Six years
CCTV	All of our sites have CCTV. At some sites it is live view only and nothing is recorded. Where recordings are kept, they are deleted after a maximum of 30 days unless retained for an incident, a complaint or a legal claim
Marketing preferences	Until you change them; a record that you opted out is kept so that we respect it
Bank details given to us for a refund	Until the refund is reconciled, then removed from working documents

When a retention period ends we delete or anonymise the data. Where data is held in a backup, it is overwritten in the normal backup cycle.

9. Your rights

Under the UK GDPR you have the right to:

- **Access** — ask for a copy of the personal data we hold about you.
- **Rectification** — ask us to correct data that is inaccurate or incomplete.
- **Erasure** — ask us to delete your data where there is no good reason for us to keep it.
- **Restriction** — ask us to limit how we use your data while a concern is resolved.
- **Objection** — object to processing based on our legitimate interests, and to direct marketing at any time.
- **Portability** — receive the data you gave us in a machine-readable format.
- **Withdraw consent** — where we rely on consent, withdraw it at any time without affecting earlier processing.

To exercise any of these rights, email doni@graniteleisure.com or write to the registered office address above. You can also ask any member of staff at our clubs, who will pass your request to the Company Director the same day. We will respond within one calendar month. We do not charge for requests unless they are clearly unfounded or excessive. We may ask you to confirm your identity if we cannot verify it from the account you contact us from.

10. Complaints

If you are unhappy with how we have handled your personal data, please tell us first at doni@graniteleisure.com so that we can put it right. You also have the right to complain to the UK supervisory authority:

Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF ·
0303 123 1113 · ico.org.uk/make-a-complaint

11. Security

We protect your data with access controls, staff training, secure cloud systems and encryption in transit. Full payment card details are never stored by Granite Leisure; they are handled by our PCI-DSS compliant payment processor. Access to customer records is limited to staff who need it for their role.

12. Cookies

Our websites use strictly necessary cookies to make the site work, and, with your consent, analytics cookies (Google Analytics via Google Tag Manager) to help us understand how the site is used. You can accept or reject non-essential cookies when you first visit and change your choice at any time through the cookie settings link in the footer. Our booking platform (ClubRight) sets its own cookies when you log in to your account; these are necessary for the service.

13. Changes to this policy

We will update this policy when our processing changes and will show the date of the latest version at the top. Significant changes will be notified to members by email.

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