
WHOLEHEARTED PERSONAL TRAINING WEBSITE PRIVACY POLICY

BACKGROUND:

Wholehearted Personal Training, (WholeheartedPT), understands that your privacy is important to you and that you care about how your personal data is used and shared online. We respect and value the privacy of everyone who visits this website www.WholeheartedPT.co.uk ("Our Site") and will only collect and use personal data in ways that are described here, and in a manner that is consistent with Our obligations and your rights under the law.

Please read this Privacy Policy carefully and ensure that you understand it. Your acceptance of Our Privacy Policy is deemed to occur upon your first use of Our Site. If you do not accept and agree with this Privacy Policy, you must stop using Our Site immediately.

1. Definitions and Interpretation

In this Policy the following terms shall have the following meanings:

"Cookie"	means a small text file placed on your computer or device by Our Site when you visit certain parts of Our Site and/or when you use certain features of Our Site. Details of the Cookies used by Our Site are set out in section 13, below;
"personal data"	means any and all data that relates to an identifiable person who can be directly or indirectly identified from that data. In this case, it means personal data that you give to Us via Our Site. This definition shall, where applicable, incorporate the definitions provided in the EU Regulation 2016/679 – the General Data Protection Regulation ("GDPR"); and
"We/Us/Our"	Wholehearted Personal Training

2. Information About Us

2.1 Our Site is owned and operated by WholeheartedPT.

3. What Does This Policy Cover?

This Privacy Policy applies only to your use of Our Site. Our Site may contain links to other websites. Please note that We have no control over how your data is collected, stored, or used by other websites and We advise you to check the privacy policies of any such websites before providing any data to them.

4. Your Rights

4.1 As a data subject, you have the following rights under the GDPR, which this Policy and Our use of personal data have been designed to uphold:

4.1.1 The right to be informed about Our collection and use of personal data;

- 4.1.2 The right of access to the personal data We hold about you.
 - 4.1.3 The right to rectification if any personal data We hold about you is inaccurate or incomplete
 - 4.1.4 The right to be forgotten – i.e. the right to ask Us to delete any personal data We hold about you.
 - 4.1.5 The right to restrict (i.e. prevent) the processing of your personal data;
 - 4.1.6 The right to data portability.
 - 4.1.7 The right to object to Us using your personal data for particular purposes; and
 - 4.1.8 Rights with respect to automated decision making and profiling.
- 4.2 If you have any cause for complaint about Our use of your personal data, please contact Us using the details provided in section 14 and We will do Our best to solve the problem for you. If We are unable to help, you also have the right to lodge a complaint with the UK's supervisory authority, the Information Commissioner's Office.

5. **What Data Do We Collect?**

Depending upon your use of Our Site, We may collect some or all of the following personal data.

- 5.1 name;
- 5.2 business/company name
- 5.3 contact information such as email addresses and telephone numbers;
- 5.4 IP address;
- 5.5 web browser type and version;
- 5.6 a list of URLs starting with a referring site, your activity on Our Site, and the site you exit to;

6. **How Do We Use Your Data?**

- 6.1 All personal data is processed and stored securely, for no longer than is necessary in light of the reason(s) for which it was first collected. We will comply with Our obligations and safeguard your rights under the GDPR at all times. For more details on security see section 7, below.
- 6.2 Our use of your personal data will always have a lawful basis, either because it is necessary for Our performance of a contract with you, because you have consented to Our use of your personal data (e.g. by subscribing to emails), or because it is in Our legitimate interests. Specifically, We may use your data for the following purposes:
 - 6.2.1 Providing and managing your Account;
 - 6.2.2 Providing and managing your access to Our Site;
 - 6.2.3 Replying to emails from you;
 - 6.2.4 Supplying you with emails that you have opted into (you may unsubscribe or opt-out at any time by contacting us at info@WholeheartedPT.co.uk;

6.2.5 Analysing your use of Our Site to enable Us to continually improve Our Site and your user experience;

6.3 With your permission and/or where permitted by law, We may also use your data for marketing purposes which may include contacting you by email, telephone, text message or post with information, news and offers on Our products or services. We will not, however, send you any unsolicited marketing or spam and will take all reasonable steps to ensure that We fully protect your rights and comply with Our obligations under the GDPR and the Privacy and Electronic Communications (EC Directive) Regulations 2003.

6.4 You have the right to withdraw your consent to Us using your personal data at any time, and to request that We delete it.

6.5 We do not keep your personal data for any longer than is necessary in light of the reason(s) for which it was first collected.

7. How and Where Do We Store Your Data?

7.1 We only keep your personal data for as long as We need to in order to use it as described above in section 6, and/or for as long as We have your permission to keep it.

7.2 Your data will only be stored or transferred within the European Economic Area and/or the UK (“the EEA&UK”). The EEA&UK consists of all EU member states, plus Norway, Iceland, and Liechtenstein plus the UK. This means that your personal data will be fully protected under the GDPR or to equivalent standards by law.

8. Do We Share Your Data?

8.1 Subject to section 8.2, We will not share any of your data with any third parties for any purposes.

8.2 In certain circumstances, We may be legally required to share certain data held by Us, which may include your personal data, for example, where We are involved in legal proceedings, where We are complying with legal obligations, a court order, or a governmental authority.

9. How Can You Control Your Data?

9.1 In addition to your rights under the GDPR, set out in section 4, when you submit personal data via Our Site, you may be given options to restrict Our use of your data. In particular, We aim to give you strong controls on Our use of your data for direct marketing purposes (including the ability to opt-out of receiving emails from Us which you may do by unsubscribing using the links provided in Our emails and at the point of providing your details).

10. Your Right to Withhold Information

10.1 You may access certain areas of Our Site without providing any data at all. However, to use all features and functions available on Our Site you may be required to submit or allow for the collection of certain data.

10.2 You may restrict Our use of Cookies.

11. How Can You Access Your Data?

You have the right to ask for a copy of any of your personal data held by Us (where such data

is held). Under the GDPR, no fee is payable and We will provide any and all information in response to your request free of charge.

12. **Our Use of Cookies**

- 12.1 Our Site may place and access certain first party Cookies on your computer or device. First party Cookies are those placed directly by Us and are used only by Us. We use Cookies to facilitate and improve your experience of Our Site. We have carefully chosen these Cookies and have taken steps to ensure that your privacy and personal data is protected and respected at all times.
- 12.2 All Cookies used by and on Our Site are used in accordance with current Cookie Law.
- 12.3 Before Cookies are placed on your computer or device, you will be shown a requesting your consent to set those Cookies. By giving your consent to the placing of Cookies you are enabling Us to provide the best possible experience and service to you. You may, if you wish, deny consent to the placing of Cookies; however certain features of Our Site may not function fully or as intended. You will be given the opportunity to allow only first party Cookies and block third party Cookies.
- 12.4 Our Site uses analytics services provided by Google. Website analytics refers to a set of tools used to collect and analyse anonymous usage information, enabling Us to better understand how Our Site is used. This, in turn, enables Us to improve Our Site. You do not have to allow Us to use these Cookies, however whilst Our use of them does not pose any risk to your privacy or your safe use of Our Site, it does enable Us to continually improve Our Site, making it a better and more useful experience for you.
- 12.5 The analytics service(s) used by Our Site use(s) Cookies to gather the required information.
- 12.6 In addition to the controls that We provide, you can choose to enable or disable Cookies in your internet browser. Most internet browsers also enable you to choose whether you wish to disable all cookies or only third party cookies. By default, most internet browsers accept Cookies but this can be changed. For further details, please consult the help menu in your internet browser or the documentation that came with your device.
- 12.7 You can choose to delete Cookies on your computer or device at any time, however you may lose any information that enables you to access Our Site more quickly and efficiently including, but not limited to, login and personalisation settings.

13. **Contacting Us**

If you have any questions about Our Site or this Privacy Policy, please contact Us by email at info@WholeheartedPT.co.uk.

14. **Changes to Our Privacy Policy**

We may change this Privacy Policy from time to time (for example, if the law changes). Any changes will be immediately posted on Our Site and you will be deemed to have accepted the terms of the Privacy Policy on your first use of Our Site following the alterations. We recommend that you check this page regularly to keep up-to-date.