

ALL ABOUT THE CORE LIMITED

PRIVACY NOTICE

1. Introduction

1.1 Welcome to All About the Core's privacy notice.

1.2 We respect your privacy and are committed to protecting your personal data. This privacy notice will inform you as to how we look after the personal data we collect from you both when you visit our website (regardless of where you visit it from) and where you create an account to enjoy our classes and/or email communications. This privacy notice tells you about your privacy rights and how the law protects you.

1.3 Please use the Glossary to understand the meaning of some of the terms used in this privacy notice.

2. Purpose of this Privacy Notice

2.1 This privacy notice aims to give you information on how All About the Core collects and processes personal data:

2.1.1 through your use of our website, including any data you may provide through our website;

2.1.2 when you contact us in respect of our classes and branded products; or

2.1.3 when we gather data provided by third parties with whom we deal in order to provide our services.

2.2 We do not collect data relating to children and this privacy notice does therefore not apply to any person under the age of 13.

2.3 It is important that you read this privacy notice together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy notice supplements the other notices and is not intended to override them.

3. Controller

All About the Core is the controller and responsible for our personal data (collectively we will be referred to as "**we**", "**us**" or "**our**" in this privacy notice).

4. Contact Details

4.1 Our full details are:

All About the Core Limited, a company incorporated and registered in England and Wales under company number 09779811 and whose registered office is situated at Cliffe Hill House 22-26 Nottingham Road Stapleford, Nottingham, NG9 8AA.

Email address: reception@allaboutthecore.co.uk

Website: www.allaboutthecore.co.uk/

Address: Fox House, 44 High Street, Cobham Surrey, KT11 3EB.

Telephone: +44 (0)1932 866709

You have the right to make a complaint at any time to the Information Commissioner's Office ("ICO"), the UK supervisory authority for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

5. Website Third-Party Links

Our website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections through our website may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements.

6. The Data We Collect About You

6.1 Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

6.2 We may collect, use, store and transfer different kinds of personal data about you which we have grouped together follows:

Identity Data includes first name, maiden name, last name, username or similar identifier, marital status, title, date of birth and gender.

Contact Data includes your email address, home address and telephone numbers.

Financial Data includes bank account and payment card details.

Transaction Data includes details of services you have received from us.

Technical Data includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website.

Profile Data includes preferences, feedback and survey responses.

Usage Data includes information about how you use our website.

Marketing and Communications Data includes your preferences in receiving marketing from us and our third parties and your communication preferences.

6.3 We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does **not** directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated

Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy notice.

- 6.4 We collect data about your health for the purpose of providing appropriate classes or adjusting our routines. Health data is a **Special Category of Personal Data** about you. Special categories of personal data also include details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information and genetic and biometric data which we do not collect. Nor do we collect any information about criminal convictions and offences.

7. **If you Fail to Provide Personal Data**

Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with services). In this case, we may have to cancel the service you require but we will notify you if this is the case at the time.

8. **How is Your Personal Data Collected?**

- 8.1 We use different methods to collect data from and about you including through:

- 8.2 **Direct interactions.** You may give us your Identity, Contact and Financial Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:

8.2.1 request information about our classes including pricing or trials;

8.2.2 subscribe to our newsletters or to receive offers;

8.2.3 request information to be sent to you;

8.2.4 complete a survey; or

8.2.5 give us some feedback.

- 8.3 **Automated technologies or interactions.** As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies.

- 8.4 **Third parties or publicly available sources.** We may receive personal data about you from various third parties and public sources which will comprise Identity and Contact Data from publicly available sources such as Companies House and the Electoral Register.

- 8.5 **Technical Data.** We may collect personal data from the following parties:

8.5.1 analytics providers such as Google based inside the EU; and

8.5.2 search information providers and credit providers based inside the EU.

9. **How We Use Your Personal Data**

- 9.1 We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:
- 9.1.1 where we need to perform the contract we are about to enter into or have entered into with you.
 - 9.1.2 where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests. Our legitimate interests are in performing services to you or promoting or furthering our services.
 - 9.1.3 where we need to comply with a legal or regulatory obligation.

10. Purposes for Which We Will Use Your Personal Data

- 10.1 We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.
- 10.2 Note that we may process your personal data for more than one lawful basis depending on the specific purpose for which we are using your data. Please [contact us](#) if you need details about the specific legal basis we are relying on to process your personal data where more than one basis has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register you as a new member or create your account	Identity Contact	Performance of a contract with you (including in anticipation of a contract)
To manage our relationship with you	Identity Contact Profile Marketing and Communications	Performance of a contract with you Necessary to comply with a legal obligation Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)
To enable you to complete a survey or competition	Identity Contact Profile Usage	Performance of a contract with you Necessary for our legitimate interests

	Marketing and Communications	
To administer and protect our business and our website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data either directly or using third party suppliers).	Identity Contact Technical	Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) Necessary to comply with a legal obligation
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences	Technical Usage	Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)

11. Marketing

- 11.1 We strive to provide you with choices regarding certain personal data uses, particularly around marketing.
- 11.2 You will receive marketing communications from us if prior to 25 May 2018 you requested information from us or after 25 May signed up for such communications and, in each case, you have not opted out of receiving that marketing.
- 11.3 We will treat your personal data with the utmost respect and will not sell on your details to third parties.

12. Opting Out

- 12.1 You can ask us to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you or by **contacting us** at any time.
- 12.2 Please be aware that the following communications are considered operation and even where you have opted out of our marketing communications you will still receive them:
- 12.2.1 Appointment Confirmation;
- 12.2.2 AutoPay Failed Notification;

- 12.2.3 Client Schedule;
- 12.2.4 Forgot Login Information;
- 12.2.5 Gift Card Delivery Email; and
- 12.2.6 Purchase Receipt.

13. Cookies and Cookie Policy

Our website uses cookies – small text files that are placed on your machine to help the site provide a better user experience. In general, cookies are used to retain user preferences, store information for things like shopping baskets, and provide anonymised tracking data to third party applications like Google Analytics. As a rule, cookies will make your browsing experience better. However, you may prefer to disable cookies on our website and on others. The most effective way to do this is to disable cookies in your browser. We suggest consulting the Help section of your browser. You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly.

We use the following cookies:

- **Strictly necessary cookies.** These are cookies that are required for the operation of our website. They include, for example, cookies that enable you to log into secure areas of our website, use a shopping cart or make use of e-billing services.
- **Analytical/performance cookies.** They allow us to recognise and count the number of visitors and to see how visitors move around our website when they are using it. This helps us to improve the way our website works, for example, by ensuring that users are finding what they are looking for easily.
- **Functionality cookies.** These are used to recognise you when you return to our website. This enables us to personalise our content for you, greet you by name and remember your preferences (for example, your choice of language or region).
- **Targeting cookies.** These cookies record your visit to our website, the pages you have visited and the links you have followed. We will use this information to make our website and the advertising displayed on it more relevant to your interests. We may also share this information with third parties for this purpose.

Please note that third parties (including, for example, advertising networks and providers of external services like web traffic analysis services) may also use cookies, over which we have no control. These cookies are likely to be analytical/performance cookies or targeting cookies.

14. Change of Purpose

- 14.1 We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible

with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please [contact us](#).

14.2 If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

14.3 Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

15. Disclosures of Your Personal Data

15.1 We may have to share your personal data with the parties set out below for the purposes set out in the table in paragraph 11 above.

15.1.1 External Third Parties as set out in the Glossary.

15.1.2 Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy notice.

15.2 We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

16. International Transfers

16.1 Whenever we transfer your personal data outside of the EEA, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

16.1.1 we will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission or where we are satisfied of the adequacy of the level and protection for personal data. Economic Area; or

16.1.2 we may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe; or

16.1.3 where we use providers based (MailChimp or Mindbody) in the United States of America, we may transfer data to them if they are part of the Privacy Shield which requires them to provide similar protection to personal data shared between the Europe and the United States of America.

17. To learn more about the Privacy Shield Framework, visit the U.S. Department of Commerce's Privacy Shield List at <https://www.privacyshield.gov/list>.

18. Data Security

18.1 We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those of our staff or other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

19. Data Retention

19.1 We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

19.2 To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

19.3 Details of retention periods for different aspects of your personal data are available in our retention policy which you can request from us by [contacting us](#).

19.4 In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

20. Your Legal Rights

20.1 Under certain circumstances, you have rights under data protection laws in relation to your personal data. If you wish to exercise any of the rights set out below after the Glossary please [contact us](#).

20.2 No fee usually required

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

20.3 What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

20.4 Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

GLOSSARY

21. Lawful Basis

Legitimate Interest means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by [contacting us](#).

Performance of Contract means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

Comply with a legal or regulatory obligation means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

22. Third Parties

- 22.1 Service providers acting as processors based inside the EEA who provide IT and system administration services.
- 22.2 Professional advisers acting as processors or joint controllers including lawyers, bankers, auditors and insurers based in the United Kingdom who provide consultancy, banking, legal, insurance and accounting services.
- 22.3 HM Revenue & Customs, regulators and other authorities acting as processors or joint controllers based in the United Kingdom.

YOUR LEGAL RIGHTS

- 22.4 You have the right to:
 - 22.4.1 **Request access** to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
 - 22.4.2 **Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
 - 22.4.3 **Request erasure** of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are

required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

- 22.4.4 **Object to processing** of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
- 22.4.5 **Request restriction of processing** of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- 22.4.6 **Request the transfer** of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- 22.4.7 **Withdraw consent at any time** where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.