

ChallengePaula

Privacy Policy May 2020

ChallengePaula is operated by Paula Aldred with its trading address at 9 Little Street, Guildford GU2 9QG ("ChallengePaula", "we", "us", "our").

This Privacy Policy ("**Privacy Policy**") sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

For the purpose of the General Data Protection Regulation, and any subsequent data protection legislation, the data controller is ChallengePaula.

Questions, comments and requests regarding this Privacy Policy are welcomed and should be addressed to **hello@challengepaula.com**

YOUR DUTY TO INFORM US OF CHANGE

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

INFORMATION WE MAY COLLECT

We may collect the following data about you, in the following ways:

Information you give us.

You may give us information about you by filling in forms on our site challengepaula.com, our associated micro-sites (our site) or by corresponding with us by phone, e-mail or otherwise. This includes information you provide when you register to use our site, subscribe to our service, search for a product, place an order on our site, enter a competition or survey and when you report a problem with our site, or complete forms in relation to Physical Activity Readiness Questionnaire (PAR-Q) . The information you give us may include your name, address, e-mail address, phone number, health related, financial and credit card information.

Information we collect about you.

With regard to each of your visits to our site we may automatically collect the following information:

- Technical information, including the Internet Protocol (IP) address used to connect your computer to the Internet, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform; and
- Information about your visit, including the full Uniform Resource Locators (URL) clickstream to, through and from our site (including date and time); products you viewed or searched for; page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page and any phone number used for the purposes of delivering your orders.

Information we receive from other sources.

We may receive information about you if you use any of the other websites we operate or the other services we provide. Or third parties we work closely with (including, for example, business partners, sub-contractors in technical, payment and delivery services, analytics providers, search information providers, credit reference agencies) and may receive information about you from them.

USES MADE OF THE INFORMATION, AND PURPOSES FOR WHICH WE USE YOUR INFORMATION

We will only use your information where the law allows us to. Most commonly, we will use your information in the following circumstances:

- Where we need to perform the contract we are about to enter into, or have entered into, with you.
- Where we need to comply with a legal or regulatory obligation.
- 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.
- Where we require your consent to process your data.
- Where, with your consent we may also seek additional information about you from 3rd parties. This may include other coaches or significant others/professionals that are relevant to your fitness, wellbeing and/or training program.

These are known as “lawful grounds”. Note that we may process your information for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us at hello@challengepaula.com if you need details about the specific legal ground we are relying on to process your personal data.

Information you give us.

We use information held about you in the following ways:

- to carry out our obligations arising from any contracts entered into between you and us and to provide you with the information, products and services that you request from us;
- even if you do not complete your registration or order, to contact you to enquire why you did not complete your registration or order;
- to provide you with information about other goods and services we offer that are similar to those that you have already purchased or enquired about;
- to provide you, or permit selected third parties to provide you, with information about goods or services we feel may interest you. If you are an existing customer, we will contact you only by electronic means with information about goods and services similar to those which were the subject of a previous sale or negotiations of a sale to you. If you are a new customer, and where we permit selected third parties to use your data, we (or they) will contact you by electronic means only if you have consented to this. If you do not want us to use your data in this way, or to pass your details on to third parties for marketing purposes, please let us know by writing at hello@challengepaula.com. Please note that it may take up to 30 days for us to process your request;
- to notify you about changes to our service, changes to our site or others changes which might otherwise affect you; and;
- to ensure that content from our site is presented in the most effective manner for you and for your computer.

Information we collect about you.

We will use this information:

- to administer our site and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
- to improve our site to ensure that content is presented in the most effective manner for you and for your computer;

- to allow you to participate in interactive features of our service, when you choose to do so;
- as part of our efforts to keep our site safe and secure;
- to measure or understand the effectiveness of advertising we serve to you and others, and to deliver relevant advertising to you; and
- to make suggestions and recommendations to you and other users of our site about goods or services that may interest you or them.

Information we receive from other sources.

We may combine this information with information you give to us and information we collect about you. We may use this information and the combined information for the purposes set out above (depending on the types of information we receive).

MARKETING

You have the right to ask us not to process your personal data for marketing purposes. If you do not wish to receive marketing materials from us any longer, please update your Contact Preferences in your online account, or alternatively write to us at hello@challengepaula.com

LINKS TO OTHER WEBSITES

Our site may contain links to other websites of interest. However, once you have used these links to leave our site, you should note that we do not have any control over that other website. Therefore, we cannot be responsible for the protection and privacy of any information which you provide whilst visiting such sites and such sites are not governed by this Privacy Policy. You should exercise caution and read the Privacy Policy applicable to the website in question before proceeding to use that website.

DISCLOSURE OF YOUR INFORMATION

We may share your information with selected third parties including:

- Business partners, suppliers and sub-contractors for the performance of any contract we enter into with them or you.
- Analytics and search engine providers that assist us in the improvement and optimisation of our site.

We may disclose your personal information if we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our terms of use or terms and conditions of sale and other agreements; or to protect the rights, property, or safety of ChallengePaula, our clients or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

WHERE WE STORE YOUR PERSONAL DATA

The data that we collect from you may be transferred to, and stored at, a destination outside the European Economic Area ("EEA"). It may also be processed by staff operating outside the EEA who work for us or for one of our suppliers. Such staff may be engaged in, among other things, the fulfilment of your order, the processing of your payment details and the provision of support services. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Policy.

All information you provide to us is stored on our secure servers. Any payment transactions will be encrypted using SSL technology. Where we have given you (or where you have chosen) a password which enables you to access certain parts of our site, you are responsible for keeping this password

confidential. We ask you not to share a password with anyone.

DATA SECURITY

Once we have received your information, we will use appropriate procedures and security features to try to prevent unauthorised access, and to prevent your information being accidentally lost. We limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your information on our instructions and they are subject to a duty of confidentiality.

Unfortunately, the transmission of information via the Internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our site. We have put in place procedures to deal with any suspected data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

HOW LONG WE WILL KEEP YOUR INFORMATION

We will only keep your information 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.

To decide 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 information, the purposes for which we process your information, and whether we can achieve those purposes through other means, and the applicable legal requirements.

YOUR LEGAL RIGHTS

Under certain circumstances, you have rights under data protection laws in relation to your information.

- Request access to your personal data (known as a “data subject access request”)
- Request correction of your personal data where there is incomplete or inaccurate information.
- Request erasure of your information where there is no good reason for us to be processing your information, or where you have successfully exercise your right to object to processing of information.
- Object to processing of your information where we are relying on legitimate interest (or those of a third party) and you believe this impacts on your fundamental rights and freedoms. (Note, we may have compelling legitimate grounds to process information which override your rights and freedoms).
- Request restriction of processing your information in the following circumstances: (a) if you want us to establish the accuracy of your information; (b) where our use of the information is unlawful but you do not want us to erase it; (c) where you need us to hold the information 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 information but we need to verify whether we have overriding legitimate grounds to use it.
- Request transfer of your information to you or a third party.
- Right to withdraw consent where we are relying on consent to process your data.

If you wish to exercise any of the rights set out above, please contact us at hello@challengepaula.com 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.

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 your information 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.

CHANGES TO OUR PRIVACY POLICY

Any changes we may make to our Privacy Policy in the future will be held in this document and, where appropriate, notified to you by e-mail. Please check back frequently to see any updates or changes to our Privacy Policy.