

## 1 Introduction

**Total Care Personal Training Ltd** are committed to protecting your privacy and providing a safe online experience as well as offline. For **Total Care Personal Training Ltd** offline privacy policy statements, please find the relevant section below.

This Privacy Policy informs visitors about the collection, use and sharing of personal information we collect on our website and our studio and also via third parties.

GDPR stands for "The General Data Protection Regulation", which super-cedes the Data Protection Act (1998).

The aim of the GDPR is to unify all EU member states' approach to data regulation to ensure all data protection laws are applied identically in every country within the EU. It further directs that all organisations must use individuals' data responsibly and gives the individual a voice as to what information is recorded and how it is shared.

## 2 About Us

**Total Care Personal Training Ltd** is the data controller and responsible for your personal data (collectively referred to as 'we', 'us' or 'our' in this document).

**Total Care Personal Training Ltd** contact details can be found on our website: <http://tcpt.co.uk/contact-us/>

**Total Care Personal Training Ltd** is also the data processor in certain situations, which are defined within this document.

We use third-party organisations as defined below:

- Online payment system;
- Fitness business system;
- Website hosting company;

Please note: We do not disclose the name of the above companies for security reasons

## 3 Terms

The following are the terms used in this document, including referenced documents.

**"Data"** generally means information which are computerised or in a structured hard copy form.

**"Personal Data"** means data relating to a living individual who is or can be identified either from the data or from the data in conjunction with other information that is in, or is likely to come into, the possession of the data controller.

**"Sensitive Personal Data"** relates to information concerning a data subject's racial or ethnic origin, political opinions, religious beliefs, trade union activities, physical or mental health, sexual life, or details of criminal offences

**"Processing"** means obtaining, recording or holding the data or carrying out any operations on the data such as organisation, retrieval, modification, dissemination or destruction.

**"Data Controller"** means a person who (either alone or jointly or in common with other persons) determines the purposes for which and the manner in which any personal data are, or are to be processed.

The **"Data Processor"** is the entity (that can be natural or legal person, public authority, agency or other body) which processes personal data on behalf of the controller under the controller's instructions.

**“Data Subject”** means an individual who is the subject of personal data. In other words, the data subject is the individual whom particular personal data is about.

#### **4 Key Questions our Privacy Policy Answers**

Our Privacy Policy answers the following questions:

1. Why is personal data processed – this is answered in the sections:
  - [How We Use & Share your Data](#);
  - [Offline Data Processing](#);
2. Whose personal data is processed – this is answered in the sections:
  - [Information We Collect](#);
  - [Children’s Data](#);
3. What personal data is processed – this is answered in the section [Information We Collect](#);
4. When is personal data processed – this is answered in the section [Offline Data Processing](#);
5. Where is personal data processed – this is answered in the sections:
  - [Information we Collect](#);
  - [Offline Data Processing](#).

You can visit and read information on our website without giving us any personally identifiable information.

There is also the option to send us a message via our contact form and members can log in to their membership account. Data will be processed for either of these two options.

In order to provide you with the most efficient and enhanced personalised service and attention and to accommodate certain requests which you make, we request information about you in certain circumstances and collect certain information automatically.

#### **5.1 Passwords for The Website**

Where we have given you (or where you have chosen) a password which enables you to access certain parts of our website including your account, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

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 website; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

#### **5.2 Information We Process**

We only process details that you send us via our contact form:

- Your (first) name;
- Your email address;
- Your phone number;

We do not collect any sensitive information.

#### **5.3 Personal Information**

We do not collect any personal information from visitors who simply visit the Website.

#### **5.4 Data We Store on Our Website**

We do not store any personal data on our website.

When you contact us, your complete message is sent via email to us and not saved on the server on which our website is hosted.

## **5.5 Technical Information**

In addition to the information described above, we may collect other information as follows:

- Internet Protocol (“IP”) addresses - which may consist of a static or dynamic IP address and will sometimes point to a specific identifiable computer or device;
- Web browser type, version and language;
- Referring and exit (web) pages and URLs;
- Date and time;
- The pages of our Website that you visit;
- The time spent on those pages and other statistics;
- Information about your device, operating system and version, carrier and country location, hardware and processor information, network type, and similar data.

## **5.6 Cookies**

Our website may use cookies in order to deliver a better experience for you. Cookies are files with small amounts of data that a website stores on your computer or mobile device’s hard drive so that certain information about your visit and web-browsing preferences will be recognised upon a return visit. Cookies serve functions such as “remembering” log-in names (and sometimes passwords), or enabling or saving shopping basket contents.

Like many websites, we may use both session cookies (which expire once you close your web browser) and persistent cookies (which stay on your computer until you delete them) to help us improve the experience you have with our Website. Most web browsers have a function that allows you to delete existing cookies on your device or you can set your browser options so that your device does not receive or accept cookies. Doing this may interfere with your ability to use the Website.

## **5.7 Third-Party Analytics**

We use third-party analytics services (such as Google Analytics) to evaluate and aggregate visitor data. These services help us evaluate visitors’ use of the Website including time spent on certain pages, which areas of the Website receive the most traffic, how often visitors visit pages within the Website, provide general geographic location about visitors and the source of referred traffic (from other websites or via search engines, etc.). These third party analytic services use cookies and other technologies to help analyze and provide us with the data. By visiting and using the Website, you consent to the collection and review of data about you by these analytics providers in the manner and for the purposes set out in this Privacy Policy.

For more information on Google Analytics, including how to opt out from certain data collection, please visit <https://www.google.com/analytics> .

Please be aware that If you opt out of any service, you may not enjoy the full functionality of the Website.

## **6 Your Rights**

The GDPR provides the following rights for individuals:

1. The right to be informed.
2. The right of access.
3. The right to rectification.
4. The right to erasure.
5. The right to restrict processing.
6. The right to data portability.
7. The right to object.
8. Rights in relation to automated decision making and profiling.

The Information Commissioner's Office' website has the complete details:

<https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/>

## **7 Accessing Your Personal Information & Communication Preferences**

To manage your receipt of marketing and non-transactional communications, you may unsubscribe by clicking the "unsubscribe" link located on the bottom of any related email from us.

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.

## **8 How We Use & Share your data**

We use the collected information to evaluate and administer our Website, fulfil your requests, respond to any problems that may arise, such as difficulties in navigating our Website or accessing certain features, and to gauge user trends.

We may also access or utilise information collected to provide our services, process orders, administer our programs, maintain and improve our Website and services to you, solicit your feedback, and to inform you about our products and services and those of our third-party marketing partners.

Under certain circumstances we may be obligated or compelled to disclose the Information:

- When required by law, court order, or other government or law enforcement authority or regulatory agency;
- Whenever we believe that disclosing such Information is necessary or advisable to protect the rights, property or safety of the Company or others.

Please see the section [Offline/How We use Your Data](#) for examples of how your data may be used by us in various cases.

## **9 Security of Your Information**

The security of your Personal Information is important to us, but remember that no method of transmission over the Internet, or method of electronic storage, is 100% secure. While we incorporate standard industry practices internally and with our services providers, which we believe suits the degree of sensitivity of the information involved, we cannot guarantee its absolute security. Because we work with third-party businesses and vendors in various aspects of our business including operating this website, database management, website security, etc., we cannot guarantee the absolute security of our databases, nor can we guarantee that the information you supply will not be intercepted while being transmitted to and from us over the Internet. In particular, e-mail sent to or from the Website may not be secure, and you should therefore take special care in deciding what information you send to us via email.

Please also see our [Data Protection Policy](#).

## **10 Children's Data**

We are strongly committed to protecting the safety and privacy of children who visit our website. We do not knowingly collect Personal Information **from** children under the age of 13 through the Website.

If you are under 13, please do not give us any Personal Information.

We encourage all parents to talk to their children about online safety and to monitor their children's use of the Internet. If you have reason to believe that a child under the age of 13 has

provided Personal Information to us, please contact us, and we will make best efforts to delete that information from our databases.

## 11 External Websites – Third Party

We may share information with third party organisations that provide specific services on our behalf or which enhance our products and your experience with us. We use third party organisations to provide you with services that complement your membership. These organisations act as a Data Processor under our instructions. They may process data securely outside of the European Economic Area (EEA). There is however, a contract in place with the third parties which includes strict terms and conditions to protect your privacy.

Notwithstanding the above, we do not control and are not responsible for the privacy practices or content of third-party websites, including those of affiliates, business partners, sponsors, advertisers, or other websites to which we may link from time to time. When visiting any third-party websites, you are responsible for reviewing the Privacy Policy and terms of use applicable to each site. They may be different than those that you see here.

## 12 Offline Data Processing

Offline data processing is defined as processing that we undertake excluding our website and includes:

- Name, address, phone number, email address;
- Employer;
- Occupation;
- Partner's name;
- GP name and phone no;
- Whether a release form from GP is required;
- Emergency contact details;
- Current medication;
- Current supplements;
- PAR-Q (Physical Activity Readiness Questionnaire) information;
- Photos.

We use a third party online system to manage this data where the company acts as a data processor on our behalf and are GDPR compliant.

Note: The above information will only be processed with your consent.

As part of our standard operations in running our business, the table below defines how and why we plan to use your personal data.

Purpose/Activity	Type of data	Lawful basis for processing
Receive enquiries and are contacted (via various methods)	(a) Contact (b) programme (order) information	Determine the service and product required from you

We complete a customer profile form to register you as a new customer and agree a programme	(a) Contact (b) programme (order) information (c) Personal details	Performance of a contract with you
We sign you up to make payment	(a) Contact (b) order information	(a) Performance of a contract with you (b) Necessary for our legitimate interests to receive payment for services
To communicate and get agreement on services we provide to you	(a) email (b) (b) programme (order) information	Necessary for our legitimate interests of running our business, provision of services and goods
Record notes on your progress on the programme	(a) Contact (b) email (c) programme (order) information	To enable us to ensure you achieve the results required

### 13 Changes to This Privacy Policy

We may update this Privacy Policy from time to time as necessary to protect our users and to comply with a changing environment. We recommend that you check the Privacy Policy when you visit our Website to be sure that you are aware of and understand our current policy. We have no intentions of making any changes to our Privacy Policy and practices to make them less protective of personal information collected in the past. By accessing the Website and/or using our services after making any such changes to this Privacy Policy, you are deemed to have accepted such changes. Please be aware that, to the extent permitted by applicable law, our use of the information is governed by the Privacy Policy in effect at the time we collect the information. You are advised to review this Privacy Policy periodically for any changes.

### 14 Contact Us

If you have any questions about this Privacy Policy, please contact us via email at [info@tcpt.co.uk](mailto:info@tcpt.co.uk) with "Privacy Policy" in the subject line.