

# Privacy Policy

## Rochester Personal Training (Rochester PT)

This Privacy Policy (“**Policy**”) relates to our website at [www.rochesterpersonaltraining.london](http://www.rochesterpersonaltraining.london) (the “**Site**”), and all related downloadable software, [mobile application] and other services provided by us and in or on which a link to this Privacy Policy is displayed, and all other communications with individuals by written or oral means, such as email or phone (collectively, together with the Site, (our “**Service**”).

This Policy describes the information that Rochester PT (“**we**” or “**us**”) gathers on or through the Service, how we use and disclose such information, and the steps we take to protect such information. By visiting the Site, or by purchasing or using any Services, you consent to the privacy practices described in this Policy.

### Definitions

“**Client**” means a customer of ours.

“**Client Data**” means personal data, reports, addresses, and other files, folders or documents in electronic form that a User of any of our Services stores within the Service which would include but not be limited to [uploaded by a Client to our Site].

“**Personal Data**” means information that specifically identifies an individual or that is linked to information that identifies a specific individual.

“**Public Area**” means the area of the Site that can be accessed both by Users and Visitors, without needing to use a login ID and a password.

“**Restricted Area**” means the area of the Site that can be accessed only by Users, and where access requires the use of a login ID and a password.

“**User**” means a Client or an employee, agent, or representative of a Client, who primarily uses the restricted areas of the Site for the purpose of accessing the Service in such capacity.

“**Visitor**” means an individual other than a User, who uses the public area, but has no access to the restricted areas of the Site or Service.

### The Information We Collect on the Service:

We collect different types of information from or through the Service:

**User-provided Information.** When you use the Service, as a User or as a Visitor, you may provide, and we may collect Personal Data. Examples of Personal Data include name, email address, mailing address, mobile phone number, and credit card or other billing information. Personal Data also includes other information, such as geographic area or preferences, when

any such information is linked to information that identifies a specific individual. You may provide us with Personal Data in various ways on the Service. For example, when you use the Service, post Client Data, interact with other users of the Service through communication or messaging capabilities, or send us customer service -related requests.

**“Automatically Collected” Information.** When a User or Visitor uses the Service, we may automatically record certain information from the User’s or Visitor’s device by using various types of technology, including cookies, “clear gifs” or “web beacons.” This “automatically collected” information may include IP address or other device address or ID, web browser and/or device type. We also may use these technologies to collect information regarding a Visitor or User’s interaction with email messages, such as whether the Visitor or User opens, clicks on, or forwards a message. This information is gathered from all Users and Visitors.

**Audio and Visual Data.** Which includes video and images taken by us for promotional purposes.

**Health Data.** Which includes personal data which is gathered for health & safety purposes including any accident report or claim log.

#### **Information from Other Sources.**

We may obtain information, including Personal Data, from third parties and sources other than the Service, such as integrated services. If we combine or associate information from other sources with Personal Data that we collect through the Service, we will treat the combined information as Personal Data in accordance with this Policy.

#### **How We Use the Information We Collect**

We use the information that we collect in a variety of ways in providing the Service and operating our business, including the following:

##### **Operations**

We use the information – other than Client Data - to operate, maintain, enhance and provide all features of the Service, to provide the services and information that you request, to respond to comments and questions and to provide support to users of the Service. We process Client Data solely in accordance with the directions provided by the applicable Client or User.

##### **Improvements**

We use the information – other than Client Data - to understand and analyze the usage trends and preferences of our Visitors and Users, to improve the Service, and

to develop new products, services, features, and functionality.

## **Communications**

We may use a Visitor's or User's email address or other information – other than Client Data – to contact that Visitor or User (i) for administrative purposes such as customer service, to address intellectual property infringement, right of privacy violations or other issues related to the Client Data or Personal Data posted on the Service or (ii) with updates on promotions and events, relating to services offered by us and by third parties we work with. You have the ability to opt-out of receiving any promotional communications as described below under **“Your Choices.”**

## **Cookies and Tracking Technologies**

“Cookies” are text-only pieces of information that a website transfers to an individual's hard drive or other website-browsing equipment for record-keeping purposes. Cookies allow the Site to remember important information that will make your use of the Site more convenient.

## **To Whom We Disclose Information**

Except as described in this Policy, we will not intentionally disclose the Personal Data or Client Data that we collect or store on the Service to third parties without the consent of the applicable Visitor, User or Client. We may disclose information to third parties if you consent to us doing so, as well as in the following circumstances:  
Unrestricted Information

Any information that you voluntarily choose to include in a Public Area of the Service, such as a chat forum will be available to any Visitor or User who has access to that content.

## **Service Providers**

We work with third party service providers who provide website, application development, hosting, maintenance, and other services for us. These third parties may have access to, or process Personal Data or Client Data as part of providing those services for us. We limit the information provided to these service providers to that which is reasonably necessary for them to perform their functions, and our contracts with them require them to maintain the confidentiality of such information.

Our company is hosted on the Wix.com platform. Wix.com provides us with the online platform that allows us to sell our services and communicate with you. Your data may be stored through Wix.com's data storage, databases and the general Wix.com applications. They store your data on secure servers behind a firewall.

## **Non Personally Identifiable Information**

We may make certain automatically-collected, aggregated, or otherwise non-personally-identifiable information available to third parties for various purposes, including (i) compliance with various reporting obligations; (ii) for business or marketing purposes.

We may disclose Personal Data or other information if required to do so by law or in the good-faith belief that such action is necessary to comply with applicable laws, in response to a court order, judicial or other government subpoena or warrant, or to otherwise cooperate with law enforcement or other governmental agencies.

We also reserve the right to disclose Personal Data or other information that we believe, in good faith, is appropriate or necessary to (i) take precautions against liability, (ii) protect ourselves or others from fraudulent, abusive, or unlawful uses or activity, (iii) investigate and defend ourselves against any third-party claims or allegations, (iv) protect the security or integrity of the Service and any facilities or equipment used to make the Service available, or (v) protect our property or other legal rights, enforce our contracts, or protect the rights, property, or safety of others.

## **Your Options**

### **Access, Correction, Deletion**

We respect your privacy rights and provide you with reasonable access to the Personal Data that you may have provided through your use of the Services. If you wish to access or amend any other Personal Data we hold about you, or to request that we delete any information about you that we have obtained from an Integrated Service, you may contact us as set forth in the “How to Contact Us” section. At your request, we will have any reference to you deleted or blocked in our database.

You may decline to share certain Personal Data with us, in which case we may not be able to provide to you some of the features and functionality of the Service. At any time, you may object to the processing of your Personal Data, on legitimate grounds, except if otherwise permitted by applicable law.

### Navigation Information

You may opt out from the collection of navigation information about your visit to the Site by [Google Analytics by using the Google Analytics Opt-out feature.]

### Opting out from Communications

If you receive emails from us, you may unsubscribe at any time by following the instructions contained within the email or by sending an email to the address provided in the [“How to Contact Us” section].

If a Client requests us to remove any data, we will respond to its request within fifteen (15) days. We will delete, amend or block access to any Personal Data that we are storing only if we receive a written request to do so from the Client who is responsible for such Personal Data, unless we have a legal right to retain such Personal Data. We reserve the right to retain a copy of such data for archiving purposes, or to defend our rights in litigation. Any such request regarding Client Data should be addressed as indicated in the ["How to Contact Us"] section, and include sufficient information for us to identify the Client and the information to delete or amend.

### **Third-Party Services**

The Services we provide may contain features or links to websites and services provided by third parties. Any information you provide on third-party sites or services is provided directly to the operators of such services and is subject to those operators' policies, if any, governing privacy and security, even if accessed through the Service. We are not responsible for the content or privacy and security practices and policies of third-party sites or services to which links or access are provided through the Service. We encourage you to learn about third parties' privacy and security policies before providing them with information.

### **Your Privacy Rights**

We will not share any Personal Data with third-parties for their direct marketing purposes to the extent prohibited by law. If our practices change, we will do so in accordance with applicable laws and will notify you in advance.

### **Interest Based Advertising**

Interest based advertising is the collection of data from different sources and across different platforms in order to predict an individual's preferences or interest and to deliver to that individual, or his/her computer, smart phone or tablet, advertising based on his/her assumed preference or interest inferred from the collection of data pertaining to that individual or others who may have a similar profile or similar interests.

We work with a variety of third parties to attempt to understand the profiles of the individuals who are most likely to be interested in our Services so that we can send them promotional emails, or serve our advertisements to them on the websites and mobile apps of other entities.

These third parties include: (a) advertising networks, which collect information about a person's interests when that person views or interacts with one of their advertisements and (b) attribution partners, which measure the effectiveness of certain advertisements. In collaboration with these third parties, we may collect information about our customers, prospects and other individuals over time and across different platforms when they use these platforms or interact with them.

[Individuals may submit information directly on our Sites or on platforms run by third parties, or by interacting with us, our advertisements, or emails they receive from us or from third parties. We may use special tools that are commonly used for this purpose, such as cookies, beacons, pixels, tags, mobile advertising IDs, flash cookies, and similar technologies].

We, or the third parties with which we work, use the information collected as described above to understand the various activities and behaviors of our customers, Site visitors and others. We, or these third parties, do this for many reasons, including: to recognise new or past visitors to our Sites; to present more personalised content; to identify visitors across devices, third party websites and sites, or to display or send personalized or targeted ads and other custom content that is more focused on a person's perceived interest in products or services similar to those that we offer.

Our interest-based ads may be served to you in emails or on third-party platforms. We may serve these ads about our products or services or send commercial communications directly ourselves or through these third parties.

Visitors may opt out of receiving interest based advertising by advertising networks that may be delivered to them on our platform and other websites by changing your browser and phone settings. These features will opt a Visitor out of many – but not all - of the interest-based advertising activities in which we or third parties engage. You can also opt out by updating your Facebook and Google settings.

### **Third Party Cookies**

We are legally required to disclose whether other third parties may collect personally identifiable information about an individual's online activities from our Site or Service.

The information gathered by these third parties is used to make predictions about your interests or preferences so that they can display advertisements or promotional material on this Site and on other sites across the Internet tailored to your apparent interests.

The business partners and advertising networks that serve interest-based advertisements on the Services have limited access to a small amount of information about your profile and your device, which is necessary to serve you advertisements that are tailored to your apparent interests. It is possible that they may reuse this small amount of information on other sites or services.

We do not share with these third parties any information that would readily identify you (such as email address); however, these third parties may have access to information about your device (such as IP or MAC address). We do not have access to, or control over, the technologies that these third parties may use to collect information about your interests, and the information practices of these third

parties are not covered by this Privacy Policy. Other than as discussed in this document, we have no control over these third parties.

## **Data Security**

We follow generally accepted industry standards to protect the information submitted to us, both during transmission and once we receive it. We maintain appropriate administrative, technical and physical safeguards to protect Personal Data against accidental or unlawful destruction, accidental loss, unauthorised alteration, unauthorised disclosure or access, misuse, and any other unlawful form of processing of the Personal Data in our possession. This includes, for example, firewalls, password protection and other access and authentication controls. We use TLS technology to encrypt data during transmission through public internet and ISO certified cloud services and applications, [and we also employ application-layer security features to further anonymise Personal Data.]

However, no method of transmission over the Internet, or method of electronic storage, is 100% secure. We cannot ensure or warrant the security of any information you transmit to us or store on the Service, and you do so at your own risk. We also cannot guarantee that such information may not be accessed, disclosed, altered, or destroyed by breach of any of our physical, technical, or managerial safeguards. If you believe your Personal Data has been compromised, please contact us as set forth in the [“How to Contact Us”] section. If we learn of a security systems breach, we will inform you of the occurrence of the breach in accordance with applicable law.

## **Data Retention**

We only retain the Personal Data collected from a User for as long as the User’s account is active or otherwise for a limited period of time as long as we need it to fulfill the purposes for which we have initially collected it, unless otherwise required by law. We will only retain and use information as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements.

## **Privacy Settings**

Although we may allow you to adjust your privacy settings to limit access to certain Personal Data, please be aware that no security measures are perfect or impenetrable. We are not responsible for circumvention of any privacy settings or security measures on the Service. Additionally, we cannot control the actions of other users with whom you may choose to share your information. Further, even after information posted on the Service is removed, caching and archiving services may have saved that information, and other users or third parties may have copied or stored the information available on the Service. We cannot and do not guarantee that information you post on or transmit to the Service will not be viewed by unauthorised persons.

## **Data Transfer**

Rochester PT will not transfer personal information outside the European Economic Area (EEA), which comprises the countries in the European Union and Iceland, Liechtenstein and Norway.

## **Foreign Visitors**

The Service is hosted in the UK. If you choose to use the Service from regions of the world with laws governing data collection and use that may differ from EU and UK law, then please note that you are transferring your Client Data and Personal Data outside of those regions to the UK for storage and processing. Also, we may transfer your data to other countries or regions in connection with storage and processing of data, fulfilling your requests, and operating the Service. By providing any information, including Client Data and Personal Data, on or to the Service, you consent to such transfer, storage, and processing.

## **Changes and Updates to this Policy**

We reserve the right to modify this privacy policy at any time, so please review it frequently. Changes and clarifications will take effect immediately upon their posting on the website.

Please revisit this page periodically to stay aware of any changes to this Policy, which we may update from time to time. If we modify the Policy, we will make it available through the Service, and indicate the date of the latest revision, and will comply with applicable law. Your continued use of the Service after the revised Policy has become effective indicates that you have read, understood and agreed to the current version of the Policy.

## **How to Contact Us**

Please contact us with any questions or comments about this Policy, your Personal Data, our use and disclosure practices, or your consent choices by email at rochesterpt@yahoo.com.

## **Changes to this privacy policy**

This privacy policy was published on [24<sup>th</sup> May 2018] and last updated on [24<sup>th</sup> May 2018].