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## PRIVACY POLICY FOR WHITTLEFIT

### 1.0 Introduction

1.1 Welcome to WhittleFit website.

1.2 This privacy policy (herein referred to as “policy”) sets out WhittleFit (“We”, “Us” and “our”, “WhittleFit triathlon coaching”, “www.whittleFit.com”) privacy practices with respect to the information collected from you, or you have provided through our websites, applications, and any other online service that links to this Privacy Policy.

1.3 The policy covers information that could identify you (“personal information”) and information that could not (“non-identifiable information”).

1.3 Our privacy policy complies with the UK law accordingly implemented, including that required by the EU General Data Protection Regulation (GDPR). The EU General Data Protection Regulation law requires us to clearly tell you about your rights and our obligations to you in regards to the collection, processing and control of your personal information.

1.4 We use cookies on our website. Provided the cookies are not strictly necessary for the provision of our website and staffing services, we will ask you to consent to our use of cookies when you first visit our website.

1.5 Apart from as set out below, we do not share, sell or disclose any information collected through our website to a third party.

1.6 By using our Site, you are accepting the practices described in this Privacy Policy. If there is any part of this policy that you are not happy about, your only alternative is to stop using the website.

## 2.0 About The Company

2.1 WhittleFit offers triathlon coaching services.

2.2 The website is owned and managed by WhittleFit, and is located in the United Kingdom.

2.3 For questions and inquiries, contact us at:

- i. Official email address: [info@WhittleFit.com](mailto:info@WhittleFit.com)
- ii. Business Address: 21 Cae'rOdyn, Dinas Powys, Vale of Glamorgan, Cardiff, CF64 4UF
- iii. Business Telephone: 07947010276

## 3.0 Data Controller officer

3.1 Details of our data controller officer is **WhittleFit**.

## 5.1 The information collected

5.1.1 To provide the best service to you, WhittleFit may collect personal information about you that you have provided directly to us.

5.1.2 You may be asked to provide your personal information, demographic information or information about your preferences or interests when you:

- i. Become a WhittleFit member or renew your membership
- ii. Sign up to receive email newsletters from us
- iii. Make a purchase on our site
- iv. Participate in surveys or special promotions
- v. Participate on social media accounts managed by WhittleFit
- vi. Participate in the website forum

- vii. Submit user generated content on any part of the Site that permit it
- viii. Knowingly volunteer information on any other part of the Site (i.e. request for customer service)

5.1.2 This information will only be collected when you voluntarily submit it to us, and you may visit our site anonymously.

## **6.0 How we collect the information**

6.1 WhittleFit may collect certain information about you when you:

- i. Sign up on our Site;
- ii. Make a purchase;
- iii. When you sign up to our newsletter or marketing;
- iv. Participate in another Site feature; or
- v. Respond to a survey or marketing communication such as e-mail.

## **7.0 How the information is used**

7.1 WhittleFit uses the information we have about you to help us personalize and continually enhance your experience with Us.

7.2 We may use your personal information to:

- i. Provide you with the products and services you request
- ii. For internal purposes to improve the content of our Web pages
- iii. Post your user generated content to our Sites as you request
- iv. Communicate with you about your account or transactions with us and send you information about features on our Sites
- v. Communicate with you about changes to our policies

- vi. Send you newsletters, offers and promotions for our products and services, third party products and services, or special events by email or another medium
- vii. Personalize content and experiences on our Sites and within emails sent to you
- viii. Optimize or improve our products, services and operations
- ix. Detect, investigate, and prevent activities that may violate our policies or be illegal
- x. Create a user account for you on [www.whittleFit.com](http://www.whittleFit.com) and to offer nursing staffing services

## **8.0 How We Protect Your Information**

- 8.1 WhittleFit implements a variety of strict security measures to maintain the safety of your personal information.
- 8.2 Your personal information is contained behind secured networks and is only accessible by a limited number of persons who have special access rights to such systems, and are required to keep the information confidential.
- 8.3 All sensitive/credit information you supply is transmitted via Secure Socket Layer (SSL) technology and then encrypted into our databases to be only accessed as stated above.
- 8.4 Note that no data storage or data transmission over the Internet, or by other means, can be guaranteed to be 100% secure. Thus, WhittleFit cannot ensure or warrant the security of any information you transmit to us. Therefore, you understand, acknowledge and agree that you transmit your personal information to our Sites at your own risk.

## **9.0 Retention and Storage of Your Personal Information**

9.1 WhittleFit retains your personal information for as long as necessary to fulfill the purpose(s) for which it was collected and to comply with applicable laws, and your consent to such purposes(s) remains valid even after termination of our friendship with you.

9.2 For the purposes set out in this Privacy Policy, WhittleFit or any of our third party agents may process and store your personal information outside of the state or province in which you reside and/or outside of the United Kingdom, and under the laws of those other jurisdictions, in certain circumstances courts, law enforcement agencies, regulatory agencies or security authorities in those other states, provinces or foreign jurisdictions may be entitled to access your personal information.

## **10.0 Erasure Or Removal Of Your Personal Data**

10.1 The data controller shall process and store your personal data only for the period necessary to achieve the purpose of storage or as far as this is granted by the European legislator or other legislators in laws or regulations to which we or our agent is subject to

10.2 If the storage purpose is not applicable, or if a storage period prescribed by the European legislator or another competent legislator expires, the personal data are routinely blocked or erased in accordance with legal requirements.

10.3 You can delete your profile and its associated data at any time via your profile page or by emailing [info@WhittleFit.com](mailto:info@WhittleFit.com) and this will also remove all your information from the storage systems referenced above.

## **11.0 Information disclosure**

### **11.1 Personal information**

11.1.1 WhittleFit complies with the EU General Data Protection Right Act.

11.1.2 Except as disclosed in this Privacy Policy, we do not sell, rent, transfer or exchange your personal information with any groups or businesses that is not part of WhittleFit without your express permission.

11.1.3 Section 11.2 does not include the website hosting partners as well as other parties who help in operating the website to serve you better, so long these parties consent to keep the information private.

11.1.4 We may also release your information when we believe release is appropriate to comply with the law, enforce our site policies, or protect ours or others' rights, property, or safety.

11.1.5 Non-personally identifiable visitor information may be provided to other parties for marketing, advertising, or other uses.

11.1.6 Financial transactions relating to our training services are handled by our payment services providers, *Paypal*. We will share transaction data with our payment services providers only to the extent necessary for the purposes of processing your payments, refunding such payments and dealing with complaints and queries relating to such payments and refunds. You can find information about the payment services providers' privacy policies and practices at [www.paypal.com](http://www.paypal.com).

## 11.2 Social Media

11.2.1 WhittleFit may offer you the ability to register, log into, “like” or otherwise interact with third party social media services, including, but not restricted to, Facebook, Instagram, YouTube, and other social media services.

11.2.2 The above features may enable integration and/or access to your social media accounts.

11.2.3 We do not control these social media services or your profiles on these services, and we do not establish privacy settings or rules for how your personal information on these services will be used. If you choose to log on to or submit information through any of these social media services, your personal

information will be subject to the applicable social media service's terms and conditions and your current privacy settings on such social media service.

11.2.4 By accessing any social media service, you will be assuming the risk that the personal information you provide on that service may be viewed and/or used by third parties for any purpose. You agree that we are not responsible for any acts or omissions by these social media service providers.

### 11.3 Images

11.3.1 During the course of WhittleFit triathlon coaching, events, workshops, social events, clinics, and volunteer activities, members of the WhittleFit coach board, coaching staff, or other WhittleFit members may take photographs of you and others.

11.3.2 By becoming a WhittleFit member, you consent to allowing your image to be used on the WhittleFit Site, social media sites, newsletters, advertising, and WhittleFit promotional materials.

11.3.3 Your images will never be used or sold for commercial purposes other than to promote the activities of the Club.

11.3.4 You or any other member may request that your personal images should not be used on WhittleFit Sites by writing to [info@WhittleFit.com](mailto:info@WhittleFit.com)

## 12.0 Accessing and Updating Your Personal Information

12.1 We encourage you to correct and update information related to your account. Upon your request, we will provide you with any unique identifying or personal information that we maintain about you and will make any appropriate changes you provide us.

12.2 You can also contact us to:

- i. Review the personal information held by us in connection with your account;
- ii. Withdraw your consent for our use and disclosure of your information;

12.3 If you contact us to do any of the things listed above, we may require you to provide sufficient information to allow us identify you and tell you about the existence, use and disclosure of your Personal Information, and this Personal Information will only be used for this purpose.

12.4 If you contact us about your Personal Information, we will respond to your request within a reasonable time and at no cost to you.

### **13.0 External links and third party contents**

13.1 WhittleFit may occasionally contain external links and contents served by third party websites. Although we try to share informative contents and link only to websites that share our top standards and respect for solitude, please, be advised that we are not responsible for how those websites collect, use, disclose, or secure the information you provide them.

13.2 Visiting those third party sites linked to [www.whittleFit.com](http://www.whittleFit.com) is at your own risk and you subject to any terms of service or privacy policy (if any) associated with such third party Sites.

### **14.0 Member Forum**

14.1 Please remember that any information you share in our member forum, message boards or feedback sections, becomes available to other members, who may take and use that information. Please be careful about what you disclose and do not post any personal information that you expect to keep private.

### **15.0 Data Breaches**

15.1 WhittleFit will report any unlawful data breach of this website's database or the database(s) of any of our third party data processors to any and all relevant persons and authorities within 72 hours of the breach if it is apparent that personal data stored in an identifiable manner has been stolen.



15.2 WhittleFit is a Safe Buy accredited website. We promise not to collect, store, or process any credit card or other payment information on our own servers.

## **16.0 Compliance With Laws And Law Enforcement**

16.1 WhittleFit cooperates with the UK government and law enforcement officials. We reserve the right to share any information we have about you with the government or law enforcement officials if need be.

16.2 The decision to share this information will be at the sole discretion of WhittleFit to protect the property and rights of WhittleFit or a third party or the personal safety of any person or to prevent any illegal unethical or legally actionable activity or to comply with the law in any other way.

## **17.0 Email communications**

17.1 If you have opted-in to receive our e-mail newsletter, WhittleFit may send you periodic e-mails.

17.2 If you would no longer like to receive promotional e-mail from us, please refer to the "Opting Out", section below to remove or modify information you have provided to us.

17.3 If you have not opted-in to receive e-mail newsletters, you will not receive these e-mails.

## **18.0 Opting Out**

18.1 At any time you can unsubscribe from WhittleFit emails using the unsubscribe links contained in any email that we send you or by contacting us at [info@WhittleFit.com](mailto:info@WhittleFit.com)

## **19.0 Cookies And Managing cookies**

### **19.1 Cookies**

19.1.1 [www.whittleFit.com](http://www.whittleFit.com) does not currently use, but may use "cookie" technology in the future.

19.1.2 A cookie is a little piece of text stored by the browser on your computer, at the request of our server.

19.1.3 We may use cookies to deliver content specific to your interests and to save your personal preferences so you do not have to re-enter them each time you connect to our website - our cookies will not be made available to other websites.

19.1.4 You are always free to decline cookies, if your browser permits, or to ask your browser to indicate when a cookie is being sent.

19.1.5 The use of cookies, as explained above, is limited to the creation of a trace identification number (TIN) every time you sign on to [www.whittleFit.com](http://www.whittleFit.com), and such cookies expire within a short time period after leaving the site.

19.1.6 If you choose to disable cookies, you may not be able to participate in some or all of the features offered through the Site.

## **19.2 Managing cookies**

19.2.1 Most browsers allow you to refuse to accept cookies and to delete cookies. To disable cookies, the methods vary from browser to browser, and from version to version. You can however obtain up-to-date information about blocking and deleting cookies via these links:

- a) <https://support.google.com/chrome/answer/95647?hl=en> (Chrome);
- b) <https://support.mozilla.org/en-US/kb/enable-and-disable-cookies-website-preferences> (Firefox);
- c) <http://www.opera.com/help/tutorials/security/cookies/> (Opera);
- d) <https://support.microsoft.com/en-gb/help/17442/windows-internet-explorer-delete-manage-cookies> (Internet Explorer);
- e) <https://support.apple.com/kb/PH21411> (Safari); and

- f) <https://privacy.microsoft.com/en-us/windows-10-microsoft-edge-and-privacy> (Edge).

19.2.2 Blocking all cookies will have a negative impact upon the usability of many websites.

19.2.3 If you block cookies, you will not be able to use all the features on our website.

## **20.0 We do not collect Information From Children**

20.1 WhittleFit does not specifically direct any content to anyone below the age of 18. To use [www.whittleFit.com](http://www.whittleFit.com), you must be at least 18 years old.

## **21.0 Legal basis for the processing**

21.1 Art. 6(1) lit. (a) GDPR serves as the legal basis for processing operations for which we obtain consent for a specific processing purpose.

21.2 If the processing of personal data is necessary for the performance of a contract to which you are a party, as is the case, for example, when processing operations are necessary for consultation or coaching, the processing is based on Article 6(1) lit. (b) GDPR. The same applies to such processing operations which are necessary for carrying out pre-contractual measures, for example in the case of inquiries about our coaching and training services.

21.3 If our company is subject to a legal obligation by which processing of personal data is required, such as for the fulfillment of tax obligations, the processing will be based on Art. 6(1) lit. (c) GDPR. In exceptional cases, the processing of personal data may be necessary to protect your vital interests.

21.4 Finally, processing operations could be based on Article 6(1) lit. f GDPR. This legal basis is used for processing operations which are not covered by any of the abovementioned legal grounds, if processing is necessary for the purposes of the legitimate interests pursued by our company or by a third party, except where such interests are overridden by your interests or fundamental rights and freedoms which require protection of personal data. Such processing operations

are particularly permissible because they have been specifically mentioned by the European legislator.

## **22.0 Policy Acceptance**

- 22.1 By using [www.whittleFit.com](http://www.whittleFit.com), you understand that you are not under any force to provide your personal information. Any personal information provided is with your full permission, and desire to provide such personal information.
- 22.2 WhittleFit is not under any obligation to verify the source from which the personal information is provided, and are considered to be provided by you, except they prove within a period of 15 days from the date of providing such information to WhittleFit's contentment that the information was provided without their free consent.

## **23.0 Policy Update**

- 23.1 WhittleFit, at its sole discretion, reserves the right to update this privacy policy by posting the latest version on this website.
- 23.2 If at any time we decide to use Personal Data in a manner significantly different from that stated in this Privacy Policy, or otherwise disclosed to you at the time it was collected, we will notify you by email, and you will have a choice as to whether or not we use your information in the new manner.
- 28.3 Users are advised to periodically check this page to be sure they are familiar with any changes.

Thanks for reading. Hopefully you are now happy that we securely look after your personal data.