

PRIVACY POLICY

Effective date 31st March 2020

Introduction

In this privacy policy, we set out details of the data that we may collect from you and how we may use that information. It is important that you take your time to read this privacy policy and associated notices so that you are fully aware of how and why we are using your data. This privacy policy is in addition to the other privacy notices and is not intended to override them.

If you provide personal information to us about other individuals, we will process such information in accordance with this privacy policy.

We have set out our privacy policy using a layered format so you can quickly and easily click through to the specific areas of interest. We have provided a glossary to help you understand the meaning of some of the terms used in this privacy policy.

Our data protection officer and how to contact us

Our Data Protection Officer ("DPO") is responsible for overseeing questions in relation to this privacy policy. If you have any questions about this privacy policy, including any requests to exercise your legal rights, please contact the DPO using the details set out below.

Email: info@9forlife.com

Postal address: 20-22 Wenlock Road, London, England, N1 7GU, Reg. no: 12483379

Complaints about how we handle your information

If you wish to contact us to make a complaint about how we handle your personal data, you can do so through our Data Protection Officer (whose contact details are above).

Changes to the privacy policy and our purposes for processing

This policy was last updated on the date shown at the top of the document.

We will only use your personal data for the purposes for which we collected it, or for reasons which we believe are 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 the DPO using the contact details provided.

We reserve the right to make changes to this policy from time to time. However, 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.

Please note that we will not process your personal data without your knowledge or consent unless this is required or permitted by law. In such cases, we will do so only in compliance with the law. The personal data we hold about you must be accurate and current. Please keep us informed if your personal data changes during your relationship with us.

The data we collect about you

Personal data, or personal information, means any information which can be used to identify an individual. It includes pseudonyms such as unique identifiers (e.g. customer, name, address, or any other identification), but excludes data from which a person cannot be identified from (anonymised data). The data that are being collected are your username, date of the entering into business cooperation with you, as well as your email address. The person that has referred you to us could be provided with your email address/s.

The information that we collect will depend on your relationship with us.

Third-party links

Our website includes links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections 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. When you leave our website, we encourage you to read the privacy policy of every website you visit.

International transfers

From time to time, we may use data processors who process your personal data outside of the European Economic Area (EEA). In these cases, we will always ensure a similar degree of protection is afforded to your data by ensuring at least one of the following safeguards is implemented.

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.

Where we use certain service providers, we may use specific contracts approved by the European Commission, which give personal data the same protection it has in Europe.

Please contact the DPO if you want further information on the specific mechanism used by us when transferring your personal data out of the EEA.

How long will you keep my personal data?

We will only retain your personal data for as long as reasonably necessary to fulfil the relevant purposes set out in this privacy notice and to satisfy our legal, statutory, accounting, or reporting requirements.

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, but not longer than 5 years.

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.

How we protect your data

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. Also, 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 personal data on our instructions, and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

Your legal rights

Under certain circumstances, you have rights under data protection laws concerning your personal data.

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 or your child and to check that we are lawfully processing it.

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. However, we may need to verify the accuracy of the new data you provide to us.

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.

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.

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.

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.

Object to automated decision making or profiling. This enables you to ask us not to subject your personal data to automated decision-making or profiling with legal or similarly significant effects.

If you wish to exercise any of your rights above, please contact the DPO.

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.

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 about your request to speed up our response.

Time limit to respond

We shall respond to all legitimate requests within one month unless your request is particularly complex or you have made several requests. In this case, we will notify you and keep you updated and may take longer to respond.

Marketing

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising.

We may use your personal data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you. You may receive marketing communications from us if you have given us your contact details when ordering a product, buying a ticket to an event or signing up for a service from us and by using our services and entering into business cooperation with us, you agree with everything abovementioned.

Data security

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