



# Privacy Policy

## Introduction

This is the privacy notice of Coach Me Slim & Trim. In this document, "we", "our", or "us" refer to Coach Me Slim & Trim.

Our registered office is at 29a Castle St, Salisbury, Wiltshire, SP1 1TT. Our email address is [consult@cmstrim.co.uk](mailto:consult@cmstrim.co.uk) and telephone number is 01980 595 502.

This is a notice to inform you of our policy about all information that we record about you. It sets out the conditions under which we may process any information that we collect from you, or that you provide to us. It covers information that could identify you ("personal information") and information that could not. In the context of the law and this notice, "process" means collect, store, transfer, use or otherwise act on information.

We take seriously the protection of your privacy and confidentiality. We understand that all visitors to our website are entitled to know that their personal data will not be used for any purpose unintended by them, and will not accidentally fall into the hands of a third party.

Our policy complies with UK law accordingly implemented, including that required by the EU General Data Protection Regulation (GDPR).

The law requires us to tell you about your rights and our obligations to you in regards to the processing and control of your personal data. We do this now, by requesting that you read the information provided at [www.knowyourprivacyrights.org](http://www.knowyourprivacyrights.org).

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

## How we process your data

### The bases on which we process information about you

The law requires us to determine under which of six defined bases we process different categories of your personal information, and to notify you of the basis for each category.

If a basis on which we process your personal information is no longer relevant then we shall immediately stop processing your data.

If the basis changes then if required by law we shall notify you of the change and of any new basis under which we have determined that we can continue to process your information.

### Information we process because we have a contractual obligation with you

When you create an account on our website, buy a product or service from us, or otherwise agree to our terms and conditions, a contract is formed between you and us.



In order to carry out our obligations under that contract we must process the information you give us. Some of this information may be personal information.

We may use it in order to:

1. verify your identity for security purposes
2. sell products to you
3. provide you with our services
4. provide you with suggestions and advice on products, services and how to obtain the most from using our website

We process this information on the basis there is a contract between us, or that you have requested we use the information before we enter into a legal contract.

Additionally, we may aggregate this information in a general way and use it to provide class information, for example to monitor our performance with respect to a particular service we provide. If we use it for this purpose, you as an individual will not be personally identifiable.

We shall continue to process this information until the contract between us ends or is terminated by either party under the terms of the contract.

### **Information we process with your consent**

Through certain actions when otherwise there is no contractual relationship between us, such as when you browse our website or ask us to provide you more information about our business, and our products and services, you provide your consent to us to process information that may be personal information.

Wherever possible, we aim to obtain your explicit consent to process this information. Sometimes you might give your consent implicitly, such as when you send us a message by e-mail to which you would reasonably expect us to reply.

We may process special category health data in order to deliver our products and services. We will obtain explicit consent from you before processing this category of data.

Except where you have consented to our use of your information for a specific purpose, we do not use your information in any way that would identify you personally. We may aggregate it in a general way and use it to provide class information, for example to monitor the performance of a particular page on our website.

If you have given us explicit permission to do so, we may from time to time pass your name and contact information to selected associates whom we consider may provide services or products you would find useful.

We continue to process your information on this basis until you withdraw your consent or it can be reasonably assumed that your consent no longer exists. You may withdraw your consent at any time by instructing us [consult@cmstrim.co.uk](mailto:consult@cmstrim.co.uk).



## **Information we process for the purposes of legitimate interests**

We may process information on the basis there is a legitimate interest, either to you or to us, of doing so.

Where we process your information on this basis, we do after having given careful consideration to:

1. whether the same objective could be achieved through other means
2. whether processing (or not processing) might cause you harm
3. whether you would expect us to process your data, and whether you would, in the round, consider it reasonable to do so

For example, we may process your data on this basis for the purposes of:

1. record-keeping for the proper and necessary administration of our business
2. responding to unsolicited communication from you to which we believe you would expect a response
3. protecting and asserting the legal rights of any party
4. insuring against or obtaining professional advice that is required to manage business risk
5. protecting your interests where we believe we have a duty to do so

## **Information we process because we have a legal obligation**

We are subject to the law like everyone else. Sometimes, we must process your information in order to comply with a statutory obligation.

For example, we may be required to give information to legal authorities if they so request or if they have the proper authorisation such as a search warrant or court order. This may include your personal information.

## **Sharing your data**

We may have to share your personal data with the parties set out below for the purposes set out above:

1. service providers who provide IT and system administration services
2. professional advisers including lawyers, bankers, auditors and insurers who provide consultancy, banking, legal, insurance and accounting services
3. HM Revenue & Customs, regulators and other authorities based in the United Kingdom and other relevant jurisdictions who require reporting of processing activities in certain circumstances
4. social media outlets whom we use to deliver relevant content and advertisements to you
5. cloud providers and email marketing platforms, including AWeber, Eventbrite and Mailchimp, in order to manage our relationship with you
6. third parties to whom we sell, transfer, or merge parts of our business or our assets



We require all third parties to whom we transfer your data to respect the security of your personal data and to treat it in accordance with the law. We only allow such third parties to process your personal data for specified purposes and in accordance with our instructions.

### **Data Security**

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. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know such data. 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.

### **Retention period for personal data**

Except as otherwise mentioned in this privacy notice, we keep your personal information only for as long as required by us:

1. to provide you with the services you have requested;
2. to comply with other law, including for the period demanded by our tax authorities;
3. to support a claim or defence in court.

## **Contacting Us**

When you contact us, whether by telephone, through our website or by e-mail, we collect the data you have given to us in order to reply with the information you need. We record your request and our reply in order to increase the efficiency of our business.

We keep personally identifiable information associated with your message, such as your name and email address so as to be able to track our communications with you to provide a high-quality service.

## **Data may be processed outside the European Union**

We may also use outsourced services in countries outside the European Union from time to time in other aspects of our business. Accordingly, data obtained within the UK or any other country could be processed outside the European Union. For example, some of the software we use has databases located in the United States of America.

We use the following safeguards with respect to data transferred outside the European Union:



1. the processor is within the same corporate group as our business or organisation and abides by the same binding corporate rules regarding data processing.
2. the data protection clauses in our contracts with data processors include transfer clauses written by or approved by a supervisory authority in the European Union
3. we comply with a code of conduct approved by a supervisory authority in the European Union
4. we are certified under an approved certification mechanism as provided for in the GDPR
5. both our organisation and the processor are public authorities between whom there is either a legally binding agreement or administrative arrangements approved by a supervisory authority in the European Union relating to protection of your information

## **Access to your own information**

At any time you may review or update personally identifiable information that we hold about you, by sending us a request at [consult@cmstrim.co.uk](mailto:consult@cmstrim.co.uk). After receiving the request, we will tell you when we expect to provide you with the information, and whether we require any fee for providing it to you.

## **Contacting us about this policy**

If you are not happy with our privacy policy or if have any complaint then you should tell us by email at [consult@cmstrim.co.uk](mailto:consult@cmstrim.co.uk). If you are in any way dissatisfied about how we process your personal information, you have a right to lodge a complaint with the Information Commissioner's Office. This can be done at <https://ico.org.uk/concerns/>.