

## SPENCER ASSOCIATES LIMITED PRIVACY POLICY

Spencer Associates Limited, registered at 6 Hichisson Road, London, SE15 3AL, company number 9861255 (**We, Us, Our**) is the data controller in respect of your use of the website outlined below, and We are committed to protecting and respecting your privacy.

A copy of this policy is available on our website [www.leannespencer.co.uk](http://www.leannespencer.co.uk) (**Our Site**) at <http://www.leannespencer.co.uk/privacy-policy>. We may amend this policy from time to time by updating Our Site and suggest you check back occasionally to ensure you are aware of any amendments, as by continuing to use Our Site you are deemed to agree to any such amendments.

This policy together with our terms of business (**Terms**) and any additional terms incorporated by reference into the Terms, (together referred to as **Our Terms of Business**) applies to your use of:

- Our services; and
- Our Site.

This policy explains how We will process any personal data We collect from you, or that you provide to Us. Please read it carefully.

### INFORMATION WE MAY COLLECT FROM YOU

We may collect and process the following data about you:

- **Submitted Information:** information that you provide, by filling in forms, clicking on icons, buttons and ads. This includes information provided at the time of purchasing Our services or registering on Our Site. We may also ask you for information when you report a problem.
- Additional information:
  - if you contact Us, We may keep a record of that correspondence;
  - We may also ask you to complete surveys that We use for research purposes, although you do not have to respond to them;
  - Details of transactions you carry out through Our Site and of the fulfilment of your orders, subscriptions or purchases. This data will include your name and contact details, and details of any transactions.
  - Details of your actions and visits to Our Site including, but not limited to, traffic data, location data, weblogs and other communication data, whether this is required for Our own billing purposes or otherwise and the resources that you access

- Data provided for the purposes of Our services, including sensitive personal data such as genetic and dietary information, which we process with your express permission; and
- Log information: when you view content on Our Site, We may automatically collect and store certain information in server logs including but not limited to internet protocol (**IP**) addresses, internet service provider (**ISP**), Device and application IDs, details of links clicked on, browser type and language, pages you view and date or time stamps.

## **COOKIES**

Cookies are text files which are transferred to your computer or Device, and accessible only to the websites which create them. Our Site may from time to time uses cookies and log files to distinguish you from other users, for statistical analysis, to understand user behaviour, to administer the Our Site, to tailor the information presented to a user based on their preferences, and to improve user experience. Any information gathered by Our Site through the use of cookies is compiled on an aggregate, anonymous basis.

Most web browsers automatically accept cookies, however you may delete, or disable cookies by following the instructions at <http://www.allaboutcookies.org/manage-cookies/>. Please note that you may not be able to take full advantage of a website if you disable cookies. Disabling cookies may impair your experience of Our Site.

Further information about cookies can be found on the Interactive Advertising Bureau's website [www.allaboutcookies.org](http://www.allaboutcookies.org).

## **WHERE WE STORE YOUR PERSONAL DATA**

The data that We collect from you may be transferred to, and stored at, a destination outside the European Economic Area (**EEA**). It may also be processed by staff operating outside the EEA who work for Us. These staff may be engaged in the fulfilment of your request, order or reservation, the processing of your payment details and the provision of support services. By submitting your personal data, you agree to this transfer, storing or processing. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy.

Where We have given you (or where you have chosen) a password that enables you to access certain parts of Our Site, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

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 Site; 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. For example, Our security and privacy policies are periodically reviewed and enhanced as necessary, and only authorised personnel have access to user information.

## **USES MADE OF THE INFORMATION**

We may use this information to understand your needs and provide you with a better service, and in particular for the following reasons:

- To supply to you our services, and to process your payments.

We only use sensitive personal data obtained from our services to supply these services to you. We will not use this data for any other reason except as expressly indicated in this section, and under the disclosure of information section below.

- As part of our services, personal and sensitive data may be shared between Us and DNAFit Ltd, registered at DNAFit Ltd, 1 Fore Street, London, EC2Y 5EJ, company number 08385726, such as your DNA sample and genetic information, who conduct DNA tests on our behalf and provide results on data supplied. We generally do not handle DNA samples as samples are sent directly from you to DNAFit for testing. The privacy policy of DNAFit Ltd can be viewed at <http://dnafit.com/privacy-policy/>.
- We may also provide personal and sensitive personal data to Our sub-contractors, such as Your name, telephone number and fitness records in order that they can provide the services.
- For statistical purposes and analysis for management purposes in order to administer Our Site or improve Our products and services.
- Internal record keeping, and administrative purposes, and to inform you about Our events, services or products, or other related information that We think would be of interest to you.
- To communicate marketing messages, newsletters and details of Our business or the businesses of carefully-selected third parties which We think may be of interest to you by post or email or similar technology (you can inform Us at any time if you no longer require marketing communications, see below).
- From time to time, We may also use your information to contact you for market research purposes or to customise the application according to your interests.

If you are an existing customer, We will only contact you by electronic means (e-mail or SMS) with information about goods and services similar to those which you have already obtained from Us.

If you are a new customer, and where We permit selected third parties to use your data, We (or they) will contact you by electronic means only if you have consented to this.

## **GOOGLE AND SOCIAL MEDIA**

If you share Our content through social media, for example by liking Us on Facebook, following or tweeting about Us on Twitter, or giving Us a '+1' via Google Plus, those social networks will record that you have done so and may set a cookie for this purpose.

In some cases, where a page on Our Site includes content from a social network, such as a Twitter feed, or Facebook comments box, those services may set a cookie even where you do not click a button. As is the case for all cookies, We cannot access those set by social networks, just as those social networks cannot access cookies We set ourselves.

Our Site uses Google Analytics, a web analytics service provided by Google, Inc. ("Google"). The information generated by the cookie about your use of Our Site (including your IP) will be transmitted to and stored by Google on servers in the United States. Google will use this information for the purpose of evaluating your use of Our Site, compiling reports on website activity for website operators and providing other services relating to website activity and internet usage. Google may also transfer this information to third parties where required to do so by law, or where such third parties process the information on Google's behalf. Google will not associate your IP with any other data held by Google. Further information about Google's privacy policy may be obtained from <http://www.google.com/privacy.html>.

From time to time Our Site may display adverts delivered by Google or other advertising networks. They may store or retrieve a cookie from your computer when serving adverts, in order to display those which are more relevant to you. These cookies are used to record information including the number of times you have seen an advertisement, but will not lead to the transfer of your name, contact details or other personally identifiable information. Further information about Google advertising, their use of cookies, and how to opt out, please visit [http://www.google.com/privacy\\_ads.html](http://www.google.com/privacy_ads.html).

We do not disclose information about identifiable individuals to Our advertisers, but We may provide them with aggregate information about Our users (for example, We may inform them that 500 men aged under 30 have clicked on their advertisement on any given day). We may also use such aggregate information to help advertisers reach the kind of audience they want to target (for example, women in SW1). We may make use of the personal data We have collected from you to enable Us to comply with Our advertisers' wishes by displaying their advertisement to that target audience.

## **DISCLOSURE OF YOUR INFORMATION**

In the event that Our business is bought out, We may disclose your personal information to the entity of which Our business is transferred and the ultimate holding company of that entity and its subsidiaries. For the purposes of this clause, the meaning of 'subsidiary' and 'subsidiaries' shall be as defined in section 1159 of the Companies Act 2006.

We may disclose your personal information to third parties:

- In the event that We sell or buy any business or assets, in which case We may disclose your personal data to Our advisers, prospective partners and the prospective seller or buyer of such business or assets. This information will be passed on to the new owner of the business.
- In the event of Our insolvency or a corporate restructuring of Our business, in which case We will share your personal information with the entity which is to assume control of Our business. The promises in this privacy policy will apply as between you and the entity which assumes operation of Our business.
- If Our business or substantially all of its assets are acquired by a third party, in which case personal data held by it about its customers will be one of the transferred assets.
- If We are under a duty to disclose or share your personal data in order to comply with any legal or regulatory obligation or request, in which case We will disclose the information as required by that legal obligation.
- In order to:
  - enforce or apply Our Terms of Business and other agreements or to investigate potential breaches; or
  - protect Our rights, property or safety or that of Our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

## **YOUR RIGHTS**

You may at any time ask Us to refrain from sending you marketing messages by sending Us an email with the words UNSUBSCRIBE in the subject box or by telephoning Us. If We contact you by email each time you receive a message you will also have the option to decline to receive further information of that type from Us.

If you would like Us to destroy information We hold about you, please let Us know. However, please note that if you use any of Our services which require you to provide personal information, deleting Our records may mean that you will need to resubmit it to continue using such services.

You may request details of personal information which We hold about you under the Data Protection Act 1998. A small fee will be payable. If you would like a copy of the information held on you or if you have any questions relating to this Privacy Policy or how We use the personal information We have about you, please send an email to [info@leannespencer.co.uk](mailto:info@leannespencer.co.uk).

Our Sites may, from time to time, contain links to and from the websites of Our partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites and any services that may be accessible through them have their own privacy policies and that We do not accept any responsibility or liability for these policies or

for any personal data that may be collected through these websites or services, such as contact and location data. Please check these policies before you submit any personal data to these websites or use these services, and in particular if you use Our services which require Us to use DNAFit Ltd, you should check their privacy policy as indicated in the section above.

## **MINORS**

Our services are not intended to be directed to persons under the age of 13 and We do not knowingly collect personal information in respect of such persons. If We discover that a child under 13 has submitted personal information to Us We will take steps to remove this information and terminate the child's account. Please notify Us immediately if you become aware that a child has provided Us with personal information.

## **YOUR ACCEPTANCE OF THIS PRIVACY POLICY**

If you do not agree to this privacy policy, please do not use the Our Site or Our Services.

By using Our Site and services, you consent to the collection and use of information by Us. Owing to the global nature of the internet infrastructure, the information you provide may be transferred in transit to countries outside the European Economic Area that do not have similar protections in place regarding your data and its use as set out in this policy. However, We have taken the steps outlined above to try to improve the security of your information. By submitting your information you consent to these transfers.

## **HOW TO CONTACT US**

We welcome your views about Our Site, and Our privacy policy. If you would like to contact Us with any queries or comments, please send an e-mail to [info@leannespencer.co.uk](mailto:info@leannespencer.co.uk).

To find out more about your rights under the Data Protection Act, visit the Information Commissioner's website: [www.dataprotection.gov.uk](http://www.dataprotection.gov.uk) or read the Act online at: [www.hms0.gov.uk/acts/acts1998/19980029.htm](http://www.hms0.gov.uk/acts/acts1998/19980029.htm).