



## Privacy Policy

### **I, Liza Phillips, am committed to protecting and respecting your privacy.**

This policy, together with any other documents referred to on it, sets out the basis on which any personal data I collect from you, or that you provide to me, will be processed by me. Please read the following carefully to understand my views and practices regarding your personal data and how I will treat it.

The rules on processing of personal data are set out in the General Data Protection Regulation (the “GDPR”)

#### **• DEFINITIONS**

**Data controller** - A controller determines the purposes and means of processing personal data.

**Data processor** - A processor is responsible for processing personal data on behalf of a controller.

**Data subject** – Natural person

#### **Categories of data: Personal data and special categories of personal data**

**Personal data** - The GDPR applies to ‘personal data’ meaning any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier (as explained in Article 6 of GDPR). For example, name, passport number, home address or private email address. Online identifiers include IP addresses and cookies.

**Special categories personal data** - The GDPR refers to sensitive personal data as ‘special categories of personal data’ (as explained in Article 9 of GDPR). The special categories specifically include genetic data, and biometric data where processed to uniquely identify an individual. Other examples include racial and ethnic origin, sexual orientation, health data, trade union membership, political opinions, religious or philosophical beliefs.

**Processing** - means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

**Third party** - means a natural or legal person, public authority, agency or body other than the data subject, controller, processor and persons who, under the direct authority of the controller or processor, are authorised to process personal data.

## **2. WHO AM I?**

I, Liza Phillips, am the data controller and I am responsible for your personal data (referred to as “I”, “me” or “my” in this privacy notice).

### **Contact Details**

My full details are:

Full name: Liza Phillips

Email address: [liza@bodytruth.co.uk](mailto:liza@bodytruth.co.uk)

Postal address: 34 Greenacre Way, Bishops Cleeve, Cheltenham, GL52 8SJ

If you are not happy with any aspect of how I collect and use your data, you have the right to complain to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)). I should be grateful if you would contact me first if you do have a complaint so that I can try to resolve it for you.

It is very important that the information I hold about you is accurate and up to date. Please let me know if at any time your personal information changes by emailing me at [liza@bodytruth.co.uk](mailto:liza@bodytruth.co.uk)

### 3. WHAT DATA DO I COLLECT ABOUT YOU?

Personal data means any information capable of identifying an individual. It does not include anonymised data.

I may process certain types of personal data about you as follows:

- **Identity Data** may include your first name, maiden name, last name, username, marital status, title, date of birth and gender.
- **Contact Data** may include your billing address, delivery address, email address and telephone numbers.
- **Transaction Data** may include details about payments between us
- **Usage Data** may include information about how you use my website, products and services.
- **Marketing and Communications Data** may include your preferences in receiving marketing communications from me and your communication preferences.

#### Sensitive Data

I need to collect the following sensitive data about you in order to deliver my services:

Health Data

I require your explicit consent for processing sensitive data, so I will ask you to sign an agreement to confirm your consent to this processing.

Where I am required to collect personal data by law, or under the terms of the contract between us and you do not provide me with that data when requested, I may not be able to perform the contract (for example, to deliver services to you). If you don't provide me with the requested data, I may have to cancel a service you have ordered but if I do, I will notify you at the time.

### 4. HOW I COLLECT YOUR PERSONAL DATA

I collect data about you through a variety of different methods including:

- **Direct interactions:** You may provide data by filling in forms on my site (or otherwise) or by communicating with me directly, by post, phone, email or otherwise, including when you:
  - order my products or services;
  - subscribe to my service or publications;
  - request resources or marketing be sent to you;
  - enter a competition, prize draw, promotion or survey; or
  - give me feedback.
- **Automated technologies or interactions:** As you use my site, I may automatically collect Technical Data about your equipment, browsing actions and usage patterns. I collect this data by using cookies, server logs and similar technologies. Please read my cookie policy for further details.

- **Third parties or publicly available sources:** I may receive personal data about you from various third parties and public sources as set out below:
  - analytics providers such as Google based outside the EU;
  - Contact, Financial and Transaction Data from providers of technical, payment and delivery services such as GoCardless and Stripe based inside and outside the EU.

## 5. HOW I USE YOUR PERSONAL DATA

I will only use your personal data when legally permitted. The most common uses of your personal data are:

Where I need to perform the contract between us.

- Where it is necessary for my legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where I need to comply with a legal or regulatory obligation.

Generally, I do not rely on consent as a legal ground for processing your personal data, other than in relation to sending marketing communications to you via email. You have the right to withdraw consent to marketing at any time by emailing me at [liza@bodytruth.co.uk](mailto:liza@bodytruth.co.uk)

### Purposes for processing your personal data

Set out below is a description of the ways I intend to use your personal data and the legal grounds on which I will process such data. I have also explained what my legitimate interests are where relevant.

I may process your personal data for more than one lawful ground, depending on the specific purpose for which I am using your data.

Please email me at [liza@bodytruth.co.uk](mailto:liza@bodytruth.co.uk)

if you need details about the specific legal ground I am relying on to process your personal data where more than one ground has been set out in the table over:

Purpose/Activity	Type of data	Lawful basis for processing
To send free resources	<ul style="list-style-type: none"> <li>• Identity</li> <li>• Contact</li> </ul>	Necessary for the performance of a contract with you.
To register you as a new client	<ul style="list-style-type: none"> <li>• Identity</li> <li>• Contact</li> </ul>	Necessary for the performance of a contract with you.
To process and deliver your product or services including: <ul style="list-style-type: none"> <li>• Delivery of product or services.</li> <li>• Manage payments, fees and charges.</li> <li>• Collect and recover money owed to me.</li> </ul>	<ul style="list-style-type: none"> <li>• Identity</li> <li>• Contact</li> <li>• Financial</li> <li>• Transaction</li> <li>• Marketing</li> <li>• Communications</li> <li>• Sensitive health data</li> </ul>	<ul style="list-style-type: none"> <li>• Necessary for the performance of a contract with you.</li> <li>• Necessary for my legitimate interests to recover debts owed to me.</li> </ul>
To manage my relationship with you which will include: <ul style="list-style-type: none"> <li>• Sharing and educating you on health and wellbeing.</li> <li>• Notifying you about changes to my terms or privacy policy.</li> <li>• Asking you to leave a review or take a survey.</li> </ul>	<ul style="list-style-type: none"> <li>• Identity</li> <li>• Contact</li> <li>• Marketing</li> <li>• Communications</li> </ul>	<ul style="list-style-type: none"> <li>• Necessary for the performance of a contract with you.</li> <li>• Necessary for my legitimate interests to keep my records updated and to study how clients use my products/services.</li> </ul>
To administer and protect my business and my site (including troubleshooting, data analysis, testing, system maintenance,	<ul style="list-style-type: none"> <li>• Identity</li> <li>• Contact</li> <li>• Technical</li> </ul>	<ul style="list-style-type: none"> <li>• Necessary for my legitimate interests for running my business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise.</li> </ul>

support, reporting and hosting of data)		<ul style="list-style-type: none"> <li>• Necessary to comply with a legal obligation.</li> </ul>
To deliver relevant content and advertisements to you and measure and understand the effectiveness of my advertising	<ul style="list-style-type: none"> <li>• Identity</li> <li>• Usage</li> <li>• Marketing</li> <li>• Communications</li> <li>• Technical</li> </ul>	Necessary for my legitimate interests to study how customers use my products or services, to develop them, to grow my business and to inform my marketing strategy.
To use data analytics to improve my website, products/services, marketing, customer relationships and experiences	<ul style="list-style-type: none"> <li>• Technical</li> <li>• Usage</li> </ul>	Necessary for my legitimate interests to define types of customers for my products and services, to keep my site updated and relevant, to develop my business and to inform my marketing strategy.
To make suggestions and recommendations to you about goods or services that may be of interest to you	<ul style="list-style-type: none"> <li>• Identity</li> <li>• Contact</li> <li>• Technical</li> <li>• Marketing</li> <li>• Communications</li> </ul>	Necessary for my legitimate interests to develop my products/services and grow my business.

### Marketing communications

You will receive marketing communications from me if you have:

- requested information from me or purchased goods or services from me; or
- if you provided me with your details and ticked the box at the point of entry of your details for me to send you marketing communications; and
- in each case, you have not opted out of receiving that marketing.

I will never share your personal data with any third party for marketing purposes.

Where you opt out of receiving my marketing communications, this will not apply to personal data provided to me as a result of a product/service purchase, warranty registration, product/service experience or other transactions.

### Further processing

If I wish to use your personal data for a new purpose, not covered by this policy, then I will provide you with a new notice explaining the new use prior to commencing the processing and setting out the relevant purposes and processing conditions.

## 6. DISCLOSURES OF YOUR PERSONAL DATA

Your personal data will be treated as strictly confidential. I may have to share your personal data with the parties set out below for the purposes set out in the table in paragraph 5 above:

- Professional advisers including lawyers, bankers, auditors and insurers who provide consultancy, banking, legal, insurance and accounting services.
- 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.

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

## 7. TRANSFER OF DATA ABROAD

Countries outside of the European Economic Area (**EEA**) do not always offer the same levels of protection to your personal data, so European law has prohibited transfers of personal data outside of the EEA unless the transfer meets certain criteria.

Many of my third parties service providers are based outside the European Economic Area (**EEA**) so their processing of your personal data will involve a transfer of data outside the EEA. Whenever I transfer your personal data out of the EEA, I do my best to ensure a similar degree of security of data by ensuring at least one of the following safeguards is implemented:

- I 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; or
- Where I use certain service providers, I may use specific contracts or codes of conduct or certification mechanisms approved by the European Commission which give personal data the same protection it has in Europe; or
- Where I use providers based in the United States, I may transfer data to them if they are part of the EU-US Privacy Shield which requires them to provide similar protection to personal data shared between the Europe and the US.

If none of the above safeguards is available, I may request your explicit consent to the specific transfer. You will have the right to withdraw this consent at any time. Please email me at [liza@bodytruth.co.uk](mailto:liza@bodytruth.co.uk) if you want further information on the specific mechanism used by me when transferring your personal data out of the EEA.

## **8. DATA SECURITY**

I 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, I limit access to your personal data to those agents, contractors and other third parties who have a business need to know such data. They will only process your personal data on my instructions and they are subject to a duty of confidentiality.

I 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 I am legally required to do so.

## **9. DATA RETENTION**

I will only retain your personal data for as long as necessary to fulfil the purposes I collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, I 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 I process your personal data and whether I can achieve those purposes through other means, and the applicable legal requirements.

By law I have to keep basic information about my customers (including Contact, Identity, Financial and Transaction Data) for six years after they cease being customers for tax purposes.

In some circumstances you can ask me to delete your data: see below for further information.

In some circumstances I may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case I may use this information indefinitely without further notice to you.

## **10. YOUR LEGAL RIGHTS**

Under certain circumstances, you have rights under data protection laws in relation to your personal data. These include the right to:

- Request a copy of the personal data which I hold about you.
- Request that I correct any personal data if it is found to be inaccurate or out of date.
- Request your personal data is erased where it is no longer necessary to retain such data.
- Object to the processing of your personal data where applicable, ie where processing is based on legitimate interests, direct marketing and processing for the purpose of scientific/historical research and statistics.
- Request a restriction is placed on further processing, where there is a dispute in relation to the accuracy or processing of your personal data.
- Request transfer of your personal data.
- Right to withdraw your consent to the processing at any time, where consent was your lawful basis for processing the data.

You can see more about these rights at:

<https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights>

If you wish to exercise any of the rights set out above, please email me at [liza@bodytruth.co.uk](mailto:liza@bodytruth.co.uk). You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, I may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, I may refuse to comply with your request in these circumstances.

I may need to request specific information from you to help me 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. I may also contact you to ask you for further information in relation to your request to speed up my response.

I try to respond to all legitimate requests within one month. Occasionally it may take me longer than a month if your request is particularly complex or you have made a number of requests. In this case, I will notify you and keep you updated.

## **11. THIRD-PARTY LINKS**

My website may include 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. I do not control these third-party websites and are not responsible for their privacy statements. When you leave my website, I encourage you to read the privacy notice of every website you visit.

## **12. COOKIES**

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly.

## **13. CHANGES TO MY PRIVACY POLICY**

Any changes I make to my privacy policy in the future will be posted on this page and, where appropriate, notified to you by e-mail. Please check back frequently to see any updates or changes to my privacy policy.

## **14. HOW TO MAKE A COMPLAINT**

To exercise all relevant rights, queries or complaints, please in the first instance contact me, Liza Phillips at [liza@bodytruth.co.uk](mailto:liza@bodytruth.co.uk)

## **15. REVIEW**

This document will reviewed by me every 12 months.

**Signed: Liza Phillips**

**Date: 25<sup>th</sup> May 2018**