

Sustainable Change Ltd – Privacy and Cookie Policy

Last updated June 2020

Introduction

Your privacy is important to Sustainable Change Ltd. This policy sets out information on the personal data we collect about you, and your rights in respect of this data. This policy applies whether you use or interact with our website (thesportdietitian.co.uk), and our related or associated web pages, social media platforms, or other online platforms (the “**Websites**”).

Our Websites may contain links to third party websites that are not covered by policy. We therefore ask you to review the privacy statements of other websites and applications to understand their information practices.

This policy contains the following information:

- Information about who we are
- The changes we may make to the policy
- Information on what we can collect
- Information on cookies
- How we store your personal data
- How we disclose your information
- Your rights regarding your personal data
- What happens when we link to other websites

1. Who We Are

Our company name is Sustainable Change Ltd (SC588863). Our registered address is 67 Learmonth Court, Edinburgh, Scotland, EH4 1PD. We are the data controller and responsible for your personal data. If you have any questions about this privacy policy, including any requests to exercise your legal rights, please contact us using the contact details set out below.

Contact details

Our full details are:

Full name of legal entity: Sustainable Change Ltd

Contact: Barbara Jamieson, Company Secretary

Postal address: 67 Learmonth Court, Edinburgh EH4 1PD

Telephone number: +447703569279

Email address: hello@thesportdietitian.co.uk

We respect your right to privacy and will only process personal information about you in accordance with applicable data protection laws. We comply with General Data Protection Regulation (2016/679) and the UK Data Protection Act 2018. If any of these laws are replaced or superseded, we will also comply with that.

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

2. Changes to the privacy policy and your duty to inform us of changes

We keep this privacy notice under regular review and, if we make any changes to this notice, we will place an updated version on our website and, where appropriate, notify you by e-mail. Regularly reviewing this page ensures you are always aware of what personal information we collect, how we use it and under what circumstances, if any, we will share it with other parties.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

3. What we may collect

Personal data, or personal information, is any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you when you use our Websites. Whenever we collect personal data about you, we must have a legal ground to do so. We will ensure that your personal data is processed lawfully, fairly, and transparently without adversely your rights. The type of data we collect is as follows:

Type of data	Purpose/Activity	Lawful Basis
Identity Data	includes first name, last name, username or similar identifier. When you email, phone, live chat or otherwise, we may collect information such as your first name, last name, email address and phone number. We will use this information to carry out the contract with you and manage our relationship with you.	(a) Necessary for the performance of a contract to which you are party or in order to take steps at the request of you prior to entering into a contract; (b) Necessary to comply with a legal obligation in relation to notifying you about changes to our terms or privacy policy; (c) Necessary for our legitimate interest (to keep our records updated).
Health Data	includes your weight, height, measurements, before and after photographs,	(a) Necessary for the performance of a contract to which you are party or in order to

	information on medical conditions, previous injuries or any other information you choose to share while participating in the services we provide to you.	<p>take steps at the request of you prior to entering into a contract;</p> <p>(b) Necessary for our legitimate interest (or those of a third party) in relation to presenting relevant content, products and services to you.</p>
Contact Data	includes billing address, invoicing address, email address and telephone numbers.	<p>(a) Necessary for the performance of a contract to which you are party or in order to take steps at the request of you prior to entering into a contract;</p> <p>(b) Necessary for the purposes of the legitimate interests pursued by us or a third party in respect of financial payments;</p> <p>(c) Necessary for our legitimate interest (or those of a third party) in relation to presenting relevant content, products and services to you.</p>
Technical Data	includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access our websites.	<p>(a) Necessary for the performance of a contract to which you are party or in order to take steps at the request of you prior to entering into a contract</p> <p>(b) Necessary for our legitimate interest (or those of a third party) in relation to presenting relevant content, products and services to you.</p>
Operational data	includes interactions with our websites, including transcripts from calls and messages from 'live chats'	<p>(a) Necessary for the performance of a contract to which you are party or in order to take steps at the request of you prior to entering into a contract</p> <p>(b) Necessary for our legitimate interest (or those of a third party) in relation to presenting relevant content, products and services to you.</p>
Marketing and Communications Data	includes your preferences in receiving marketing from us and our third parties and your communication preferences.	<p>(a) Necessary for the performance of a contract to which you are party or in order to take steps at the request of you prior to entering into a contract</p> <p>(b) Necessary for our legitimate interest (or those of a third party) in relation to</p>

		<p>presenting relevant content, products and services to you.</p> <p>(c) Necessary for our legitimate interest (or those of a third party) (to study how clients use our products/services, to develop them, to grow our business and to inform our marketing strategy)</p>
Interaction Data	includes any information that you might provide to any discussion forums on our websites.	<p>(a) Necessary for the performance of a contract to which you are party or in order to take steps at the request of you prior to entering into a contract</p> <p>(b) Necessary for our legitimate interest (or those of a third party) in relation to presenting relevant content, products and services to you.</p> <p>(c) Necessary for our legitimate interest (or those of a third party) (to study how clients use our products/services, to develop them, to grow our business and to inform our marketing strategy)</p>
Cookies Data	like many websites, we use "cookies" to enhance your experience and gather information about visitors and visits to our websites. Please refer to the "Do we use 'cookies'?" section below for information about cookies and how we use them and what kind.	<p>(a) Necessary for the performance of a contract to which you are party or in order to take steps at the request of you prior to entering into a contract</p> <p>(b) Necessary for our legitimate interest (or those of a third party) in relation to presenting relevant content, products and services to you.</p> <p>(c) Necessary for our legitimate interest (or those of a third party) (to study how clients use our products/services, to develop them, to grow our business and to inform our marketing strategy)</p>
Third Parties and Information	we receive from other sources. We may receive information about you if you use any of the other websites we operate. In this case we will have informed you when we collected that data that it may be shared internally and combined with data collected on our websites or	<p>(a) Necessary for the performance of a contract to which you are party or in order to take steps at the request of you prior to entering into a contract</p> <p>(b) Necessary for our legitimate interest (or those of a third party) in relation to</p>

	through our services. We are also working closely with third parties (including, for example, business partners, suppliers, sub-contractors, advertising networks, analytics providers, and search information providers) and may receive information about you from them. Further information on these partners are noted in 4.11 of this Privacy Policy.	presenting relevant content, products and services to you.
Analytics	includes third-party analytics services (such as Google Analytics) to evaluate your use of the website, compile reports on activity, collect demographic data, analyse performance metrics, and collect and evaluate other information relating to the website and internet usage. These third parties use cookies and other technologies to help analyse and provide us the data. By accessing and using the website, you consent to the processing of data about you by these analytics providers in the manner and for the purposes set out in this Privacy Policy	<p>(a) Necessary for the performance of a contract to which you are party or in order to take steps at the request of you prior to entering into a contract</p> <p>(b) Necessary for our legitimate interest (or those of a third party) in relation to presenting relevant content, products and services to you.</p>
Health, fitness, lifestyle and personal history information	(including information on religious or other beliefs, where relevant) where you purchase our services.	<p>(a) Necessary for the performance of a contract to which you are party or in order to take steps at the request of you prior to entering into a contract</p> <p>(b) Necessary for our legitimate interest (or those of a third party) in relation to presenting relevant content, products and services to you.</p>

We may process your data for compliance with a regulatory requirement or legal obligation to which we are subject too. Your data will only be processed if processing the data to comply with such obligation is a reasonable and appropriate way of achieving compliance.

We also collect, use and share Aggregated Data such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this Privacy Policy.

Where we collect Special Categories of Personal Data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data, including but not limited to your illness history) and it is necessary to do so for the services, we will obtain your specific consent, unless we have another lawful basis to do so.

4. Third Parties

We work with third-party partners who help us provide and improve our products and services. We, acting under a lawful basis, (as set out in section 3) may have to share your personal data (as set out in Table 1) with the following third parties (but not limited to):

- PT Distinction, an online personal training data management software.
- WhatsApp, an online communication app. Employees of Sustainable Change Ltd will use this app to communicate with one another. Employees of Sustainable Change Ltd. are not permitted to use any other form of communication app except telephone conversation to use your data.
- Telegram, an online communication platform.
- Typeform, a data management platform.
- Calendly, a time management and booking platform.
- Gmail, an online email platform. Sustainable Change Ltd will use this platform to market its business.
- Aircall, an online recording software. The software records calls that Employees of Sustainable Change Ltd may have with you. Aircall will collect all data as and when mentioned on the call. Aircall will not record any financial details including any bank or card details. Aircall stops recording when such data is shared.
- The Settlers, an online messaging service. The Settlers will operate an online introductory messaging service prior to any calls with Employees or connected persons with Sustainable Change Ltd.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

5. Information on cookies

We use cookies in accordance with the Privacy and Electronic Communications Regulations (implementing the EU Directive 2002/58/EC).

Cookies are small text files placed on your device when you visit our site and are used to make the user's experience more efficient. We are able to store cookies on your computer where they are necessary for the operation of the site however, for non-essential cookies we need your permission.

We use cookies to distinguish users and to improve our Website. We analyse how you use our website, and we look at aggregate statistics about your usage, and how others use our Website. We collect certain information from these cookies, and this includes information about your IP address, your location when you access the Website, the date and time you access the Website, the language you use and the type of browser you use.

We do not track individual users or use cookies to identify individuals. We use cookies to recognise you and your preferences, improve our site's performance and collect analytical information for ourselves and our business partners. Without the knowledge gained we would not be able to provide the service we do.

These are the types of cookies we use.

- 'Session cookies' allow us to track your actions during a single browsing session, but they do not remain on your device afterwards
- 'Persistent cookies' remain on your device between sessions. We use them to authenticate you and to remember your preferences. We can also use them to balance the load on our servers and improve your experience on our Website

Session and persistent cookies can be either first or third party cookies. A first-party cookie is set by the Website being visited; a third-party cookie is set by a different website. Both types of cookie may be used by us or our business partners.

The third party cookies we use are:

- Google Analytics – this is a web analytics service provided by Google, Inc. The cookies used by Google Analytics help us to analyse how users use our website and to count the number of people who use it. Google Analytics stores your IP address anonymously. Google does not associate your IP address with any personally identifiable information
- Facebook Ads – these cookies collect information about how visitors use our website. This data is collected anonymously and is used to help improve our website's functionality
- Google Ad Words – these cookies collect information about how visitors use our website. This data is collected anonymously, to help make our marketing communications more relevant, and is used to improve our website's functionality

All our cookies are categorised by the role they fulfil on our Website:

- a. **Strictly Necessary:** these are essential to enable you to move around our Website and use features such as secure services. Without these cookies such services could not be provided;
- b. **Functionality:** allow the website to remember your choices and to personal certain features. These cookies may be anonymised and cannot track your browsing activity on other websites; and
- c. **Performance:** collect information as to how users use the Website. These cookies don't collect information that identifies a visitor. The information collected is aggregated and used to improve our Website.
- d. None of the cookies employed are classified as Behavioural Targeting.

We will always ask for your consent to use non-essential cookies. You are free to withhold consent to this, but it means that we might not be able to provide the full Website experience to you.

If at any time you wish to disable our cookies, you may do so through the settings on your browser, or whenever the pop-up appears on our Website (each time you access the Website).

6. How we store your personal data

We store all your personal data on our servers within the United Kingdom.

We may transfer your collected data to storage outside the European Economic Area (EEA). It may be processed outside the EEA to fulfil your order and to receive our services and deal with payment. If we do store or transfer data outside the EEA, we will take all reasonable steps to ensure that your data is treated as safely and securely as it would be within the EEA.

This means that sometimes we may need to use legally binding contractual terms between us and any third parties we engage with and the use of the EU-approved Model Contractual Arrangements.

Where we use providers based in the US, we may transfer data to them if they are part of the Privacy Shield which requires them to provide similar protection to personal data shared between the Europe and the US. For further details, see the European Commission: EU-US Privacy Shield.

Data security is of great importance to us, and to protect your data we have put in place suitable physical, electronic and managerial procedures to safeguard and secure data collected through our Website. 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. They will only process your personal data on our instructions, and they are subject to a duty of confidentiality.

We will still be responsible for protection of your personal data, even where we have transferred it outside the EEA.

We regularly review our data retention obligations to ensure we are not retaining data for longer to fulfil the purposes we collected it for, including the including for the purposes of satisfying any legal accounting, or reporting requirements.

7. How we disclose your information

We may disclose your information in the following cases:

- If we want to sell our business, or our company, we can disclose it to the potential buyer
- We can disclose it to other businesses in our group, as defined in the Companies Act 2006
- We can disclose it if we have a legal obligation to do so, or in order to protect other people's property, safety or rights
- We can exchange information with others to protect against fraud or credit risks

We may contract with third parties to supply services to you on our behalf. These include cloud services used to send emails and technology providers that assist in providing the communication to you.

8. Your Legal rights

When you provide us with personal data, you have certain legal rights, and these include:

- To request access to, deletion of or correction of, your personal data held by us at no cost to you
- To request that your personal data be transferred to another person (data portability)
- To be informed of what data processing is taking place
- To restrict processing
- To object to processing of your personal data
- To complain to a supervisory authority
- Right to withdraw consent

If you wish to access, rectify, erase or transfer your personal data, please contact us at hello@thesportdietitian.co.uk.

9. What happens when we link to other websites

This privacy policy only relates to our Websites. We might have links on our Website to other websites, and these websites will have their own terms and conditions and privacy policies. You should check those privacy policies before providing your personal data to those website.

Please note that our terms and conditions and our policies will not apply to other websites that you get to via a link from our Website. We have no control over how your data is collected, stored or used by other websites and we advise you to check the privacy policies of any such websites before providing any data to them.

10. The changes we may make to this policy

We can update this policy from time to time as laws change or as Websites change. If we make material changes to the policy, and we need your consent to those changes, we will contact you by email to do so.