MBE Coaching customer privacy notice

This privacy notice tells you what to expect us to do with your personal information.

- Contact details
- What information we collect, use, and why
- Lawful bases and data protection rights
- Where we get personal information from
- How long we keep information
- Who we share information with
- How to complain

Contact details

Telephone

07368482124

Email

mbecoachingfit@gmail.com

What information we collect, use, and why

We collect or use the following information to **provide and improve products and services for clients**:

- Names and contact details
- Gender
- Date of birth
- Payment details (including card or bank information for transfers and direct debits)
- Transaction data (including details about payments to and from you and details of products and services you have purchased)
- Usage data (including information about how you interact with and use our website, products and services)
- Health information (such as medical records or health conditions)
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We also collect or use the following special category information to **provide and improve products and services for clients.** This information is subject to additional protection due to its sensitive nature:

- Health information

We collect or use the following personal information for the **operation of client or customer accounts**:

- Names and contact details
- Purchase or service history
- Account information, including registration details
- Information used for security purposes

We also collect or use the following special category information for the **operation of client or customer accounts.** This information is subject to additional protection due to its sensitive nature:

- Health information

We collect or use the following personal information to **comply with legal requirements**:

- Name
- Contact information
- Client account information
- Health and safety information
- Any other personal information required to comply with legal obligations
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We collect or use the following personal information to **protect client welfare**:

- Names and contact information
- Client account information
- Health and wellbeing information
- Emergency contact details

We also collect or use the following special category information to **protect client welfare.** This information is subject to additional protection due to its sensitive nature:

- Health information

We collect or use the following personal information for **dealing with queries, complaints or claims**:

- Names and contact details
- Payment details
- Account information
- Purchase or service history
- Photographs
- Customer or client accounts and records
- Financial transaction information
- Information relating to health and safety (including incident investigation details and reports and accident book records)
- Correspondence

We also collect or use the following special category information for **dealing with queries, complaints or claims.** This information is subject to additional protection due to its sensitive nature:

- Health information

Lawful bases and data protection rights

Under UK data protection law, we must have a "lawful basis" for collecting and using your personal information. There is a list of possible lawful bases in the UK GDPR. You can find out more about lawful bases on the ICO's website.

Lawful basis for processing personal information – Article 6 UK GDPR

MBE Coaching processes personal information on the lawful basis of contract where processing is necessary to provide our coaching services, We may also process personal information where necessary to comply with legal obligations or where another lawful basis applies to a specific purpose.

Processing health information – Article 9 UK GDPR

MBE Coaching collects and processes special-category personal data relating to health, including information about injuries and medical conditions, to understand clients' needs, assess their suitability for coaching and support the safe planning and delivery of our services.

Where we process health information, we intend to rely on **explicit consent under Article 9 (2)(a) UK GDPR**, where this is an appropriate and valid condition for the processing. We will explain how this information is used and seek explicit consent through a separate, clear opt-in where required.

Health information will be handled securely and used only for the purposes explained in this privacy notice.

Which lawful basis we rely on may affect your data protection rights which are set out in brief below. You can find out more about your data protection rights and the exemptions which may apply on the ICO's website:

- **Your right of access** - You have the right to ask us for copies of your personal information. You can request other information such as details about where we get personal information from and who we share personal information with. There are some exemptions which means you may not receive all the information you ask for. Read more about the right of access.
- **Your right to rectification** - You have the right to ask us to correct or delete personal information you think is inaccurate or incomplete. Read more about the right to rectification.
- **Your right to erasure** - You have the right to ask us to delete your personal information. Read more about the right to erasure.
- **Your right to restriction of processing** - You have the right to ask us to limit how we can use your personal information. Read more about the right to restriction of processing.
- **Your right to object to processing** - You have the right to object to the processing of your personal data. Read more about the right to object to processing.
- **Your right to data portability** - You have the right to ask that we transfer the personal information you gave us to another organisation, or to you. Read more about the right to data portability.
- **Your right to withdraw consent** – When we use consent as our lawful basis you have the right to withdraw your consent at any time. Read more about the right to withdraw consent.

If you make a request, we must respond to you without undue delay and in any event within one month.

To make a data protection rights request, please contact us using the contact details at the top of this privacy notice.

Our lawful bases for the collection and use of your data

Our lawful bases for collecting or using personal information to **provide and improve products and services for clients** are:

- Contract – we have to collect or use the information so we can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object.
- Legal obligation – we have to collect or use your information so we can comply with the law. All of your data protection rights may apply, except the right to erasure, the right to object and the right to data portability.
- Legitimate interests – we're collecting or using your information because it benefits you, our organisation or someone else, without causing an undue risk of harm to anyone. All of your data protection rights may apply, except the right to portability. Our legitimate interests are:

- MBE Coaching has a legitimate interest in reviewing client feedback and service-related information to evaluate the quality of it\'s coaching services, identify areas for improvement, and ensure that the services offered continue to meet the clients\' needs. Only information relevant to the purposes will be used, and clients\' privacy rights will be respected.

For more information on our use of legitimate interests as a lawful basis you can contact us using the contact details set out above.

Our lawful bases for collecting or using personal information for the **operation of client or customer accounts** are:

- Contract – we have to collect or use the information so we can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object.
- Legal obligation – we have to collect or use your information so we can comply with the law. All of your data protection rights may apply, except the right to erasure, the right to object and the right to data portability.

Our lawful bases for collecting or using personal information to **comply with legal requirements**:

- Legal obligation – we have to collect or use your information so we can comply with the law. All of your data protection rights may apply, except the right to erasure, the right to object and the right to data portability.

  Our lawful bases for collecting or using personal information to **protect client welfare** are:

- Contract – we have to collect or use the information so we can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object.
- Legal obligation – we have to collect or use your information so we can comply with the law. All of your data protection rights may apply, except the right to erasure, the right to object and the right to data portability.

  Our lawful bases for collecting or using personal information for **dealing with queries, complaints or claims** are:

- Contract – we have to collect or use the information so we can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object.

Where we get personal information from

- Directly from you

How long we keep information

We keep personal information only for as long as necessary for the purposes for which it was collected, including providing coaching services, meeting legal obligations and handling complaints or potential legal claims.

Unsuccessful applications will be securely deleted 6 months after our last contact

Enquiries and free consultations will be securely deleted 6 months after our last contact

Active clients' coaching and health records will be reviewed for deletion 2 years after coaching ends

Complaints, incidents and potential claims will be accessed individually and retained only as long as reasonably necessary

Financial and Tax records will be securely retained for the period required by applicable tax and accounting rules, and securely deleted when they are no longer required

Who we share information with

Data processors

Google Forms

This data processor does the following activities for us: Collects and stores coaching application responses, including clients\' contact details, goals and any health information they choose to provide.

Everfit\/ABC Trainerize

This data processor does the following activities for us: Hosts client coaching accounts and supports the delivery or personalised workout programmes, progress tracking and communication with clients.

Shopify

Hosts the business website and processes customer information associated with website enquiries, purchases and checkout, where these features are used

Payment provider (once chosen)

Processes coaching payments and related transaction information to facilitate payment for services.

Others we share personal information with

- Publicly on our website, social media or other marketing and information media
- Suppliers and service providers

How to complain

If you have any concerns about our use of your personal information, you can make a data protection complaint to us:

Email: mbecoachingfit@gmail.com

If you remain unhappy with how we've used your data after raising a complaint with us, you can also complain to the ICO.

The ICO's address:

ICO Head Office
4th Floor, No.3 Circle Square
5 Hawkshaw Street
Manchester
M1 7BL

Helpline number: 0303 123 1113
Website: https://www.ico.org.uk/make-a-complaint