

# Privacy Policy

Last updated: **21/08/23**

**Club Thrive** (“the Company”, “us”, “we”, or “our”), operates the website **www.club-thrive.com**. We may change or add to this privacy notice, so we encourage you to come back and read it periodically. **Club Thrive** is the data controller that resides in **29 Ethelbert Close, Bromley, BR11JB**.

This privacy notice governs the website **Club Thrive** informs you of our policies regarding the collection, use, and disclosure of personal data when you use our Service and the choices you have associated with that data. Your privacy is very important to us.

We use your data to provide and improve our site. By using the site, you agree to the collection and use of information in accordance with this policy.

## DATA WE COLLECT

While using our site, we may ask you to provide us with certain personal data that can be used to contact or identify you (“Personal Data”). Personal Data may include, but is not limited to:

- **Email address**
- **First name and last name**
- **Phone number**
- **Address, State, Province, ZIP/Postal code, City**

**For clients who work with the company, we may also collect further, voluntary information to enable us to provide our service in an optimized manner. Some data collected from clients may include:**

- Sensitive Information
- Goals and Aspirations
- Business Details
- Health Related Information

### **If you fail to provide personal data**

Where we need to collect personal data by law, or under the terms of a contract we have with you, and you do not provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with goods and/or services). In this case, we may cancel a product and/or service you have with us, but we will notify you if this is the case at the time.

### **Opting Out**

You may ask us or third parties to stop sending you marketing messages at any time by following the opt-out or unsubscribe links on any marketing message sent to you.

Note when you opt-out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a product/service purchase, warranty registration, product/service experience or other transactions.

### **Information Collected Automatically**

Like many websites, we and our service providers, such as Facebook, use cookies, web beacons and other technologies to receive and store certain types of information when you interact with us through your computer or mobile device. Using these technologies helps us recognize you, customize your experience and make relevant marketing messages. Here are some of the types of information we collect:

- **Log & Device data.** When you visit our site, we may automatically record information (“log data”), including information that your browser sends whenever you visit our site. This log data may include your web address you came from or are going to, your device model, operating system, browser type, unique device identifier, IP address, mobile network carrier, and time zone or location.
- **Cookie data.** We may use “cookies” (a small text file sent by your computer each time you visit our site) or similar technologies to record log data. When we use cookies, we may use “session” cookies (that last until you close your browser) or “persistent” cookies (that last until you or your browser delete them). To help us make e-mails more useful and interesting, we often receive a confirmation when you open e-mail from us if your computer supports such capabilities. You can opt out of receiving emails from us. Please see the Your Choices section below.

## HOW WE USE YOUR INFORMATION

We may use information that we collect about you to:

- **Provide our Products and Services.** We will use your information to provide our products and services to you
- **Understand and improve our products.** We will perform research and analysis about your use of, or interest in, our products, services, or content, or products, services or content offered by others. We do this to help make our products better and to develop new products.
- **Communicate with you.** We may send you emails about new product features or other news about us or on topics we think would be relevant to you. You may opt out of these at any time. Visit the Your Choices section below.

· **Responding to your requests.** We will also use your information to respond to your questions or comments.

We may contact you to inform you about changes in our services, our service offering and other important service related notices such as changes to the privacy policy or about security or fraud notices.

We may develop and display content and advertising tailored to your interests on our products and services on our site and on other sites;

We also may use your information to manage our business or perform functions as otherwise described to you at the time of collection.

## **Sharing and Disclosure**

We do not share your personal information with others except as indicated within this policy or when we inform you and give you an opportunity to opt out of having your personal information shared.

We will share your information in the following ways

· **With third party service providers, agents, or contractors.** We use other companies, agents or contractors (“Service Providers”) to perform services on our behalf or to assist us with providing services to you. For example, we may engage Service Providers to process credit card transactions or other payment methods. Or, we may engage Service Providers to provide services such as marketing, advertising, communications, infrastructure and IT services, to provide customer service, to collect debts, and to analyse and enhance data (including data about users’ interactions with our service). These Service Providers may have access to your personal or other information in order to provide these functions. In addition, some of the information we request may be collected by third party providers on our behalf. We do not authorize

them to use or disclose your personal information except in connection with providing their services.

**Analytics:** Specifically for analytics providers, we use Google Analytics Google Analytics which is a web analytics service offered by Google that tracks and reports website traffic. Google uses the data collected to track and monitor the use of our Service. This data is shared with other Google services. Google may use the collected data to contextualize and personalize the ads of its own advertising network.

You can opt-out of having made your activity on the Service available to Google Analytics by installing the Google Analytics opt-out browser add-on. The add-on prevents the Google Analytics JavaScript (ga.js, analytics.js, and dc.js) from sharing information with Google Analytics about visits activity. For more information on the privacy practices of Google, please visit the Google Privacy & Terms web page: <https://www.google.com/intl/en/policies/privacy/> Google also recommends installing the Google Analytics Opt-out Browser Add-on – <https://tools.google.com/dlpage/gaoptout> – for your web browser. Google Analytics Opt-out Browser Add-on provides visitors with the ability to prevent their data from being collected and used by Google Analytics.

### **Advertising:**

We may use third-party Service Providers to show advertisements, which may include targeted advertisements on a third party site after you have visited our website. We and the third party service providers use cookies to inform, optimize, measure performance serve ads based on your previous visits to our site.

Please note at this time, we do not recognize automated browser signals regarding tracking mechanisms, which may include “do not track” instructions.

We work with Google AdSense & DoubleClick Cookie Google, as a third party vendor, uses cookies to serve ads on our site. Google’s use of the DoubleClick cookie enables it

and its partners to serve ads to our users based on their visit to our Service or other websites on the Internet. You may opt out of the use of the DoubleClick Cookie for interest-based advertising by visiting the Google Ads Settings web page:

<https://www.google.com/ads/preferences/>

**Facebook:** You can learn more about interest-based advertising from Facebook by visiting this page: <https://www.facebook.com/help/516147308587266/>

To opt-out from Facebook's interest-based ads follow these instructions from Facebook:

<https://www.facebook.com/help/568137493302217>

To see more about Facebook's participation in the Digital Advertising Alliance please visit the Choices section of this notice.

For more information on the privacy practices of Facebook, please visit Facebook's Data Policy: <https://www.facebook.com/privacy/explanation>

**Payment Providers:** We may provide paid products and/or services within the site. When we do, we use third-party services for payment processing (e.g. payment processors). We will not store or collect your payment card details. That information is provided directly to our third-party payment processors whose use of your personal information is governed by their own privacy notice. The payment processors we work with adhere to the standards set by PCI-DSS as managed by the PCI Security Standards Council, which is a joint effort of brands like Visa, Mastercard, American Express and Discover. PCI-DSS requirements help ensure the secure handling of payment information.

**The payment processors we work with are:**

Paypal – Please [view their privacy policy here](#)

Stripe – Please [view their privacy policy here](#)

- **To comply with legal process or to protect Club Thrive.** If we believe that disclosure is reasonably necessary to comply with a law, regulation, legal or governmental request; to enforce applicable terms of use, including investigation of potential violations thereof; to protect the safety, rights, or property of the public, any person, or Club Thrive as required by law; or to detect, prevent, or otherwise address, security or technical issues or illegal or suspected illegal activities (including fraud).

- **Business Transfers.**

We may engage in a merger, acquisition, bankruptcy, dissolution, reorganization, or similar transaction or proceeding that involves the transfer of the information described in this Policy. In such transitions, customer information is typically one of the business assets that is transferred or acquired by a third party. In the unlikely event that we or substantially all of our assets are acquired or enter a court proceeding, you acknowledge that such transfers may occur and that your personal information can continue to be used as set forth in this privacy policy.

## **Links to Other Sites**

We may have links on our site to other sites that we do not operate. If you click on a third party link, you will be taken directly to that site which is governed by its own privacy notice. We strongly encourage you to read that privacy notice. We do not control that site and assume no responsibility for the content, policies or its practices.

## **Retention**

**Club Thrive** will retain your Personal Data only for as long as is necessary for the purposes set out in this Privacy Notice. We will retain and use your Personal Data to the extent necessary to comply with our legal obligations (for example, if we are required to retain your data to comply with applicable laws), resolve disputes, and enforce our legal agreements and policies.

**Club Thrive** will also retain Usage Data for internal analysis purposes. Usage Data is generally retained for a shorter period of time, except when this data is used to strengthen the security or to improve the functionality of our Service, or we are legally obligated to retain this data for longer time periods.

### **Choices and Individual Rights:**

We aim to take reasonable steps so you can correct, amend, delete or limit the use of your Personal Data.

You have the following choices:

- **E-mail.** As described above, if you do not wish to receive promotional e-mails from us, you may opt out at any time.
- Your browser's help function should contain instructions on how to set your computer to accept all cookies, to notify you when a cookie is issued, or to not receive cookies at any time.
- You can opt out of online targeted advertising by opting out within the advertisement itself or by visiting [Digital Advertising Alliance](http://www.aboutads.info/), <http://www.aboutads.info/>, the Digital Advertising Alliance of Canada in Canada <http://youradchoices.ca/> or the



European Interactive Digital Advertising Alliance in Europe

<https://www.youronlinechoices.eu/>. You can also opt out of the Digital Advertising Alliance using your mobile device settings.

### **Your rights under certain circumstances:**

To access and receive a copy of the Personal Data we hold about you.

To rectify any Personal Data held about you that is inaccurate

To request the deletion of Personal Data held about you

You have the right to data portability for the information you have provided to us. You can request to obtain a copy of this information in a commonly used electronic format so that you can manage and move it. We will need to verify your identity before being able to respond to such requests. Please contact us at [kate@club-thrive.com](mailto:kate@club-thrive.com)

### **Your legal rights**

Under certain circumstances, you have rights under data protection laws in relation to your personal data.

You have the following data protection rights:

**Your right of access** to your personal data (commonly known as a “data subject access request”). This enables you ask us for copies of the personal data we hold about you.

**Your right of rectification** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected.

**Your right to request erasure** of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your

personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

**Your right to object to the processing** of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

**Your right to request the restriction** of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios:

- If you want us to establish the data's accuracy.
- Where our use of the data is unlawful but you do not want us to erase it.
- Where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims.
- You have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

**Your right to request the transfer** of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

**Your right to withdraw consent at any time** where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not

be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

If you wish to exercise any of the rights set out above, please email us at

[kate@club-thrive.com](mailto:kate@club-thrive.com)

### **No fee usually required**

We will not charge you to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive, vexacious or excessive. Alternatively, we could refuse to comply with your request in these circumstances.

### **What we may need from you**

We may need specific information from you to help us 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. We may also contact you to ask you for further information in relation to your request to speed up our response.

### **Time limit to respond**

We aim to respond to all legitimate requests within one month. Sometimes it could take us longer if your request is particularly complex or you have made a number of requests. In this case, we will keep you updated.

## **Security**

We believe we use reasonable administrative, logical, physical and managerial measures to safeguard your personal information against loss, theft and unauthorized

access, use and modification. Unfortunately, no measures can be guaranteed to provide 100% security. Accordingly, we cannot guarantee the security of your information.

### **Our policy on children's information**

Our site is not directed to children under 16. If you learn that your minor child has provided us with personal information without your consent, please contact us.

### **Changes to the Policy**

We may change this policy from time to time, and if we do make changes, we'll post any changes on this page. If you continue to visit our site after those changes are in effect, you agree to the revised policy. If the changes are significant, we may provide more prominent notice or get your consent on the new policy.

### **Contacting Us**

If you have any questions or comments about this policy, please contact us at [kate@club-thrive.com](mailto:kate@club-thrive.com)

### **Cookies Policy**

**Last updated: 21/08/23**

**Club Thrive** ("us", "we", or "our") uses cookies on the Website [www.club-thrive.com](http://www.club-thrive.com) (the "Service"). By using the Service, you consent to the use of cookies.

Our Cookies Policy explains what cookies are, how we use cookies, how third-parties we may partner with may use cookies on the Service, your choices regarding cookies and further information about cookies.

## **What are cookies**

Cookies are small pieces of text sent to your web browser by a website you visit. A cookie file is stored in your web browser and allows the Service or a third-party to recognize you and make your next visit easier and the Service more useful to you.

Cookies can be “persistent” or “session” cookies. Persistent cookies remain on your personal computer or mobile device when you go offline, while session cookies are deleted as soon as you close your web browser.

## **How Club Thrive uses cookies**

When you use and access the Service, we may place a number of cookies files in your web browser.

We use cookies for the following purposes:

- To enable certain functions of the Service
- To provide analytics

We use both session and persistent cookies on the Service and we use different types of cookies to run the Service:

- Essential cookies. We may use cookies to remember information that changes the way the Service behaves or looks, such as a user’s language preference on the Service.

- Analytics cookies. We may use analytics cookies to track information how the Service is used so that we can make improvements. We may also use analytics cookies to test new advertisements, pages, features or new functionality of the Service to see how our users react to them.

### **Third-party cookies**

In addition to our own cookies, we may also use various third-parties cookies to report usage statistics of the Service, deliver advertisements on and through the Service, and so on.

### **What are your choices regarding cookies**

If you'd like to delete cookies or instruct your web browser to delete or refuse cookies, please visit the help pages of your web browser.

Please note, however, that if you delete cookies or refuse to accept them, you might not be able to use all of the features we offer, you may not be able to store your preferences, and some of our pages might not display properly.

- For the Chrome web browser, please visit this page from Google:  
<https://support.google.com/accounts/answer/32050>
- For the Internet Explorer web browser, please visit this page from Microsoft:  
<https://support.microsoft.com/kb/278835>
- For the Firefox web browser, please visit this page from Mozilla:  
<https://support.mozilla.org/en-US/kb/delete-cookies-remove-info-websites-stored>
- For the Safari web browser, please visit this page from Apple:  
<https://support.apple.com/en-gb/HT201265>

- For any other web browser, please visit your web browser's official web pages.

### **Where can you find more information about cookies**

You can learn more about cookies and the following third-party websites:

- AllAboutCookies: <https://www.allaboutcookies.org/>
- Network Advertising Initiative: <http://www.networkadvertising.org/>

### **Disclaimer:**

This policy may be changed at any time at **Club Thrive** discretion. If we should update this policy, we will post the updates to this page on our Website.

**This policy was last updated: 21/08/23**

If you have any questions or concerns regarding our privacy policy please direct them to [kate@club-thrive.com](mailto:kate@club-thrive.com) You may also send a letter to:

**29 Ethelbert Close, Bromley, BR11JB**