

Welcome to the GoodGym's privacy policy.

GoodGym respects your privacy and is committed to protecting your personal data. This privacy policy will inform you as to how we look after your personal data when you visit our Website (regardless of where you visit it from) and tell you about your privacy rights and how the law protects you.

**1**

## Important information and who we are

### Purpose of this privacy policy

This privacy policy aims to give you information on how GoodGym collects and processes your personal data through your use of the website at <https://www.goodgym.org> and its associated sub-domains (the "Website"), including any personal data you may provide through the Website when you sign up to our newsletter, purchase any service or take part in a competition.

The Website is not intended for children and we do not knowingly collect data relating to children.

It is important that you read this privacy policy together with any other privacy policy or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy policy supplements the other notices and is not intended to override them.

### Controller

The Good Gym (company number 06995775) (collectively referred to as "GoodGym", "we", "us" or "our" in this privacy policy) is a data controller in respect of personal data collected in respect of volunteers and persons we assist.

We have appointed a data protection officer who is responsible for overseeing questions in relation to this privacy policy. If you have any questions about this privacy policy, including any requests to exercise your legal rights, please contact the data privacy manager using the details set out below.

### Contact details

Our full details are:

<b>Full name of legal entity</b>	The Good Gym (company number 06995775)
<b>Data protection manager</b>	Patrick Sinclair <a href="mailto:support@goodgym.org">support@goodgym.org</a>
<b>Postal address</b>	GoodGym, 33 Holborn, London, EC1N 2TD

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](http://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.

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

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.

## Third-party links

The 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. We do not control these third-party websites and are not responsible for their privacy statements. When you leave the Website, we encourage you to read the privacy policy of every website you visit.

## A bit about our data subjects

We use some terms in this policy to refer to different types of data subjects:

- **GoodGymers:** these are volunteers who carry out missions with us which include (i) a run, walk, or cycle to help older people with one-off tasks (ii) run, walk, or cycle regularly to see an isolated older person and (iii) group runs.
- **Coaches:** these are older people visited by our GoodGymers.
- **Referrers:** these are people who provide us with referrals to Coaches and in the process may provide us with personal information about themselves.

References to "you" are to GoodGymers, Coaches and Referrers, as well as donors and other people with whom we interact.

## 2 The data we collect about you

Personal data, or personal information, means 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 which we have grouped together as follows:

- **Identity Data** includes name and username or similar identifier, data of birth/age, profile picture and social media links, Referrer organisation.
- **Contact Data** includes address, email address and telephone number.
- **Financial Data** includes bank account and payment card details.
- **Transaction Data** includes details about payments to and from you and other details of donations you have made to us.
- **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 the Website.

- **Profile Data** includes your username and password, purchases made by you, your interests, preferences, reasons for working with us, information on experience, qualifications and background, feedback and survey responses.
- **Coach Data** includes next of kind details, medical details, support and environment information, any notes taken by Runners or our staff and feedback given by the Coach or any Runner.
- **Usage Data** includes information about how you use the Website and our services.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.

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.

Save for information on your ethnicity which is used to report to our funders, we do not collect any **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). Nor do we collect any information about criminal convictions and offences.

## 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 fail to 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 or services). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

### 3

## How is your personal data collected?

We use different methods to collect data from and about you including through:

### Direct interactions

You may give us your Identity, Contact, Profile, Coach and Financial Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:

- apply to become a Runner or Coach;
- refer a Coach;
- provide us with feedback on a Coach or Runner;
- create an account on our Website;
- subscribe to publications or mailing list;
- request marketing to be sent to you;
- enter a competition, promotion or survey; or
- give us some feedback.



### **Automated technologies or interactions**

As you interact with our Website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies. Please see [our cookie policy](#) for further details.

### **Third parties or publicly available sources**

We may receive personal data about you from various third parties and public sources as set out below:

- Technical Data from the following parties:
  - analytics providers;
  - advertising networks; and
  - search information providers.
- Contact, Financial and Transaction Data from providers of technical, payment and delivery services.
- Identity and Contact Data from data brokers, DBS search providers, or data aggregators.
- Identity, Contact and Profile Data from referees.
- Identity, Contact, Profile and Coach Data from Referrers.
- Identity and Contact Data from publicly available sources such as Companies House.

## **4**

## **How we use your personal data**

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.

Generally we do not rely on consent as a legal basis for processing your personal data other than in relation to (i) sending third party direct marketing communications to you via email (ii) processing certain Special Categories of Personal Data, namely Coach health information and Runner DBS information. You have the right to withdraw consent to marketing at any time by contacting us.

## **Purposes for which we will use your personal data**

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register you as a Runner, Referrer or Coach	a. Identity b. Contact c. Profile d. Coach	Performance of a contract with you
To process any subscription or donation including: a. Manage payments, fees and charges b. Collect and recover money owed to us	a. Identity b. Contact c. Financial d. Transaction e. Marketing and Communications	a. Performance of a contract with you b. Necessary for our legitimate interests (to recover debts due to us)
To manage our relationship with you which will include: a. Notifying you about changes to our terms or privacy policy b. Asking you to leave a review or take a survey c. sending you communications in respect of any runs in which you may wish to participate and other service related communications	a. Identity b. Contact c. Profile d. Marketing and Communications	a. Performance of a contract with you b. Necessary to comply with a legal obligation c. Necessary for our legitimate interests (to keep our records updated and to study how Runners and Coaches use our services)
To enable you to partake in a prize draw, competition or complete a survey	a. Identity b. Contact c. Profile d. Usage e. Marketing and Communications	a. Performance of a contract with you b. Necessary for our legitimate interests (to study how Runners and Coaches use our services)
To administer and protect our business and the Website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	a. Identity b. Contact c. Technical	a. Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) b. Necessary to comply with a legal obligation
To deliver relevant Website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you	a. Identity b. Contact c. Profile d. Usage e. Marketing and Communications f. Technical	Necessary for our legitimate interests (to study how Runners and Coaches use our services, to develop them, to grow our business and to inform our marketing strategy)
To use data analytics to improve the Website, products/services, marketing, customer relationships and experiences	a. Technical b. Usage	Necessary for our legitimate interests (to keep our Website updated and relevant, to develop our business and to inform our marketing strategy)
To make suggestions and recommendations to you about goods or services that may be of interest to you	a. Identity b. Contact c. Technical d. Usage e. Profile	Necessary for our legitimate interests (to develop our products/services and grow our business)
To monitor your welfare	a. Identity b. Contact c. Coach d. Profile	Necessary for our legitimate interests (to ensure that you are safe)
To report any unlawful activity or activity that poses a risk to Coaches and other Runners	a. Identity b. Contact c. Profile	a. Necessary for our legitimate interests (to ensure that you are safe) b. Necessary to comply with a legal obligation"

# Marketing

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising. You may withdraw any consent given to receive direct marketing communications from us by contacting us.

## Promotional offers from us

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which services and offers may be relevant for you. We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising. You may withdraw any consent given to receive direct marketing communications from us by contacting us.

You will receive marketing communications from us if you have requested information from us or purchased services from us or if you provided us with your details when you entered a competition or registered for a promotion and, in each case, you have not opted out of receiving that marketing.

## Third-party marketing

We will get your express opt-in consent before we share your personal data with any company in order to allow them to market to you.

We do provide your obfuscated email address to Facebook to improve our advertising campaigns (e.g. so that we don't needlessly show you adverts to join GoodGym). [Find out how your email address is obfuscated.](#)

## Opting out

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

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of you purchasing services from us.

## 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 the Website may become inaccessible or not function properly.

## Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.



## 5

# Disclosures of your personal data

We may have to share your personal data with the parties set out below for the purposes set out in the table in paragraph 4 above.

- External Third Parties include our funders, payment providers, analytics and technical providers, applications to track your runs, messaging and customer service applications and checking software. You can see a more [detailed list of the third parties](#) with whom we work with.
- Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy policy.

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.

## 6

# International transfers

Some of our external third parties 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 we transfer your personal data out of the EEA, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- Where we use certain service providers, we may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe. For further details, see [European Commission: Model contracts for the transfer of personal data to third countries](#).
- 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 [European Commission: EU-US Privacy Shield](#).

Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the EEA.

## 7

# Data security

We 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, 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 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 we are legally required to do so.

## 8

# Data retention

## How long will you use my personal data for?

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

To determine the appropriate retention period for personal data, we 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 we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements. Details of retention periods for different aspects of your personal data are available in our retention policy which you can request from us by contacting us. In some circumstances you can ask us to delete your data: see Erasure Request below for further information. In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

## 9

# Your legal rights

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

You have the right to:

- **Request access** to your personal data (commonly known as a "**data subject access request**"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- **Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- **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.
- **Object to 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 particular 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.
- **Request 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:
  - a. if you want us to establish the data's accuracy;
  - b. where our use of the data is unlawful but you do not want us to erase it;
  - c. 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; or
  - d. you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.



- **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.
- **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 contact us.

## No fee usually required

You will not have to pay a fee 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 or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

## What we may need from you

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