

#### **Privacy Policy**

This Privacy Policy describes how and when Elitewellness collects, uses and shares information that we have about your when you visit, contact us or make a purchase from us. This is either directly, through our website www.elitewellness.co.uk ("the Website") or through our type2plan www.type2plan.co.uk, hosted sales platform or service.

This Privacy Policy does not apply to the practices of third parties that we do not own or control.

## Personal Information we collect

### Order Information

In order to process any purchase through the Website or directly we need you to provide certain information to us. This includes your name, billing and shipping address, email address, telephone number, payment information (including credit/debit card numbers), details of the product or programme session or plan you have ordered, delivery information and preferences and any other personal information required to fulfil your plan or programme preferences. We refer to this information as "Order or programme Information".

#### Device Information

When you visit the Website we automatically collect certain information about your device, including information about your web browser, IP address, time zone, and some of the cookies that are installed on your device. Additionally, as you browse the Website we collect information about the individual web pages or products that you view, what websites or search terms referred you to the website and information about how you interact with the website. We refer to this automatically collected information as "Device Information". We collect Device Information using the following technologies;

- "Cookies" are data files that are placed on your device or computer and often include an anonymous unique identifier. For more information about cookies and how to disable them please visit http://www.allaboutcookies.org.
- "Log Files" track actions occurring on the Website and collect data including your IP address, browser type, Internet service provider, referring/exit pages, and date/time stamps.
- "Web Beacons", "Tags" and "Pixels" are electronic files used to record information about how you browse the Website.

When we talk about Personal Information in this Privacy Policy we are talking about both Device Information and Order Information.

# Legal Basis for Collecting Information

We rely on a number of legal bases to collect, use and share your information including;

- As required to provide our products and services, such as when we use your information to fulfil your order, to settle and disputes, or to provide customer support as required;
- When you have provided your affirmative consent, which you may revoke at any time, such as by signing up to our mailing list;
- If retaining information about your purchases is required by law necessary, for example to comply with a legal obligation or court order or in connection with a legal claim;
- As necessary for the purpose of legitimate business interests, if those legitimate interests are not overridden by your rights or interests, such as;

- providing and improving our services
- complying with the legitimate requirements of third parties necessary to provide our services and products

#### Use of Personal Information

We use the Order Information that we collect in order to fulfil any orders placed through the Website or directly through other sales channels. This includes processing your payment information, arranging shipping and delivery, and providing you with invoices, confirmations and updates by both email and post. Additionally, we use Order Information to:

- Communicate with you about your order.
- To respond to Customer Service queries and resolve any problems you may have.
- Screen our orders for potential risk or fraud.
- When in line with the preferences you have shared with us to provide you with information or promotions relating to our products and services and any health and lifestyle tips.

We use the Device Information to help us screen for potential risk and fraud and to improve and optimise our Website, for example by generating analytical data about customer browsers and to assess the success of our marketing and advertising campaigns.

We do not store any credit or debit card details nor any PayPal log in details or passwords.

#### Sharing your Personal Information

Information about our customers is important to our business and we only share your personal information for very limited reasons and in limited circumstances as follows;

- Service providers. We engage certain trusted third parties to perform functions and provide services. Eg website hosting and delivery companies. We only share what information is necessary for them to perform these services.
- We use pay Pal <u>www.paypal.com</u> and Stripe (<u>www.stripe.com</u>) to process payments please refer to their individual privacy policy for use of personal information.
- Google Analytics. We use Google Analytics to help us understand how our customers use the Website. You can read more about how Google uses your Personal Information here: https://www.google.com/intl/en/policies/privacy
- Legal Compliance. We may use, retain and share your information as necessary to comply with legal and tax requirements and respond to legal or government requests. Also where necessary to enforce our agreements, terms and policies, prevent, investigate and resolve fraud and other illegal activities, security or technical issues. Also to protect the rights, property and safety of customers or others.

## **Data Retention**

When you place an order through the Website or sign up to our Mailing List, we will maintain and retain your Personal Information for our records unless and until you ask us to delete this information.

## Changes

We may update this Privacy Policy from time to time in order to reflect, for example, changes to our practices or for other operational, legal or regulatory reasons.

### Minors

This Website is not intended for individuals under the age of 18. If you are under 18 we require that you inform a parent or guardian about our Privacy Policy and Terms and Conditions as well as requiring their consent to it before registering with our Website or placing an order.

# Your Rights

If you are a European resident, you have the right to access and receive a copy Personal Information we hold about you and to ask that your Personal Information be corrected and updated. You are also entitled to ask us to delete your Personal Information and, other than as required for exceptional legal circumstances, we will delete all of your Personal Information on receipt of your request.

If you would like to exercise this right please contact us at the details in the section below.

You can object to our processing of your Personal Information and to receiving marketing messages from us even after providing your express consent to do so to us. Once we are in receipt of your objection we will delete all of your Personal Information unless we are required to keep any for legal reasons.

If you reside in the EU you are entitled to raise a concern or complaint about the use of your data through your local data protection authority. Please note that your information may be transferred outside of Europe, including to Canada and the United States, to access third party hosting services. As a result your data may be transferred to a jurisdiction with different data protection and legal frameworks. This will only be done for contractual necessity to access third party services. In this case appropriate privacy frameworks, eg Privacy Shield, will be used for the transfer.

# **Contact Us**

For the purpose of EU data protection law, Donald Gordon is the data controller for Personal Information.

For more information about our Privacy Policy or practice or if you have any questions, would like to receive a copy of the Personal Information we hold on you or would like to make a complaint then please contact us using the following contact details;

Elite wellness 62 Ravel Gardens Aveley Essex RM15 4NH info@elitewellness.co.uk.