



## Privacy Policy for Gym Spa Soho Ltd. – Online and Social Media Presence.

Version: 0.7  
Date: 02/06/21  
Author: Gym Spa Soho Ltd  
Stored at: Local

## SweatboxSoho.Com Privacy Statement:

Who will use my data?	SweatboxSoho.com is operated by Gym Spa Soho Ltd. We will use your information strictly in accordance with this policy when you visit our website, contact us, or use any of our online services. For a copy of the policy relating to our Gym and Sauna location please contact us using the details below.
What for?	We use personal information for purposes of promoting our Gym and Sauna business activities, providing customer information and making available online services to our customers and prospective customers. If you join our mailing list or contact us using our email link we will also use the information we collect to notify you about important changes to our business, new services and special offers we think you will find interesting. You may notify us of your desire not to receive these offers by clicking the unsubscribe link contained in any such email or by contacting us at anytime.
What will happen if I contact you?	If you visit our website and/or contact us we will use your information to send you the information you have requested and updates, offers and other information that we think you will be interested in.
What data will be stored?	We will store your personal details, such as name, address, email and phone number and other personal details in order to provide our Gym and Sauna services to you. We will store details of enquiries made plus limited amounts of technical information that we collect when you visit our website. We do not routinely collect sensitive personal information but where this is the case we will only process sensitive personal data with your explicit consent.
What data will be shared?	We will not share your data with any third parties other than as described in this Privacy Policy. We may share data with our website hosting company and other technology companies we use to provide our online services. We will share your information with any regulator or legal body that requests it.
How long?	Your data will be stored only for only as long as necessary to provide our services to you and to run our business as described in our Data Retention policy after which time your data will be deleted.
Who can access my data?	Access to your data will be managed carefully and we will always keep your data safe. We will never give access to, sell, share or otherwise distribute your data to any other third party other than as described here and as you would reasonably expect.
How is my data kept secure?	We will store your data on secure servers which may be processed in the UK and outside the UK. Where data is processed outside the UK we will ensure that your data is secure as described in the following Privacy Policy.

--	--

We take your privacy seriously and will only use your personal information to provide the information and services you have requested from us and to send you information about products and services you may be interested in. We will never sell, share or use your personal information other than as described here.

## About This Privacy Policy

This policy sets out how we will use and share the information that you give us. This policy describes your relationship with Gym Spa Soho Ltd. when you visit us online. The General Data Protection Regulation (GDPR) describes how organisations like ours must collect, handle, process and store personal information.

These rules apply regardless of whether data is stored electronically, on paper or on other materials. To comply with the law, personal information must be collected and used fairly, stored safely and not disclosed unlawfully. GDPR is underpinned by eight important principals. These say that personal data must:

- Be processed fairly and lawfully
- Be obtained only for specific, lawful purposes
- Be adequate, relevant and not excessive
- Be accurate and kept up to date
- Not be held for any longer than is necessary
- Processed in accordance with the rights of the data subjects
- Be protected in appropriate ways
- Not be transferred outside the United Kingdom unless that country or territory also ensures an adequate level of protection

We take these responsibilities seriously, this document describes our approach to data protection. This policy helps to protect us from data security risks, including:

- Breaches of confidentiality. For instance, information being given out inappropriately.
- Failing to offer choice. For instance, all individuals should be free to choose how the company uses data relating to them.
- Reputational damage. For instance, the company could suffer if hackers successfully gained access to sensitive data.
- Any other loss or damage caused as a result of data breaches of other data issues.

## Who We Are And How To Contact Us

This website is operated by Gym Spa Soho Ltd, this company is registered in the UK [Reg number: 9503449], and is registered with the Information Commissioner's Office with the registration number ZA174451. The data controller is: Mark Ford. You can contact us in any of the following ways:

Email: [Mark@Sweatboxsoho.com](mailto:Mark@Sweatboxsoho.com)  
Phone: 020 3214 6014  
Website: <https://www.sweatboxsoho.com>  
Post: 18 Carlisle St, Soho, London W1D 3BX

## Who this privacy policy applies to

Gym Spa Soho Ltd. is a Gym and Sauna business. This policy relates to users of our website [sweatboxsoho.com](https://www.sweatboxsoho.com) and associated social media platforms. Processing of your data is required in order to provide our online services to you and to manage and grow our business. This policy applies to individuals who have shared their data with Gym Spa Soho Ltd. when you visit our website, use the contact us function, email us, or contact us via our social media platforms. or in any other capacity.

It applies to all data that the company holds relating to identifiable individuals, even if that information technically falls outside of the GDPR. This policy relates to our online properties and can include:

- Names of Individuals
- Email Addresses
- Telephone numbers
- Medical information (allergies, medication, other info)
- Sensitive information as required for us to provide our services to you and as you chose to share with us
- Financial information including payment information as required
- Information we collect from third parties including our website development and hosting company
- Information we collect for online sources such as social media, search engines, and advertising platforms
- Any other information provided to us in relation to our Gym and Sauna services

## What this policy applies to

This section describes the lawful basis for processing your data and applies to the information about yourself that you choose to provide us with or that you allow us to collect. This includes:

- The Information you provide when you contact us
- When you contact us in order to discuss using our Gym and Sauna services

- Information we collect about how you use the website, social media and online services
- Any information that is given and stored as part of our ongoing relationship

We do not routinely collect or process sensitive data about you however this may be required in particular where you have an allergy, medical condition, or need to share other information with us in order for us to provide our services to you. Where we collect sensitive information from you we will do this with your consent and will ensure we keep this information safe at all times.

## How your information will be used

We will only use your personal data for the purposes for which we collected it and as you would reasonably expect your data to be processed and only where there is a lawful basis for such processing, for example:

<b>Purpose/Activity</b>	<b>Type of data</b>	<b>Lawful basis for processing</b>
To register you as a new customer, guest, visitor etc...	(a) Identity, (b) Contact	Performance of a contract with you, to meet our legal obligations, in our legitimate interest to run our business
To process and deliver the services you request including managing payments, fees and charges, and to 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 owed to us
To manage our ongoing relationship with you which will include notifying you about changes to our terms, products and services, or privacy policy, to maintain our records	(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 customers use our products/services
To administer and protect our business and our site (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity, (b) Contact, (c) Technical information	(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 content and advertisements to you and measure and understand the effectiveness of our advertising	(a) Identity, (b) Contact, (c) Profile, (d) Usage, (e) Marketing and Communications, (f) Technical information	Necessary for our legitimate interests to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy

To use data analytics to improve our website, products/services, marketing, customer relationships and experiences	(a) Technical info, (b) Usage, (c) cookies, analytics, and tracking info where implemented	Necessary for our legitimate interests to define types of customers for our products and services, to keep our site 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) cookies, analytics, and tracking info where implemented	Necessary for our legitimate interests to develop our products/services and grow our business

We may collect and process information about you and may take personal information from:

- Information that you provide to us when you email us, call us, or visit our website, social media sites, and other online platforms (including your contact details, phone number, email address, IP address, other technical information, and information you send to us when you contact us)
- Information that you provide to us when signing up to any distribution lists to receive correspondence from us

Personal data we receive will be used for the purposes it was provided, including:

- To respond to queries from you regarding our services
- To carry out our obligations arising from any contracts entered into between you and us, including the provision of services, and to respond to queries from you regarding those contracts
- To manage and administer the relationships between you and us
- To notify you about changes to our services and to otherwise communicate with you; for example, we will use your contact details in order to respond to any queries that you submit to us
- To obtain feedback from you regarding us

In accordance with your preferences, we may also use your personal information to provide you with information about products, services, promotions and offers that may be of interest to you. We may use your personal information in order to ascertain the services, promotions and offers that are likely to be of particular interest to you. This document explains how you can change whether to receive this information. Please note that, even if you choose not to receive this information, we may still use your personal information to provide you with important services communications, including communications in relation to any purchases you make or services you use.

## How to change your preferences

We operate in line with the GDPR and Data Protection Act (2018) data protection guidelines. We respect your rights and will respond to any request for access to personal information and requests to delete, rectify, transfer, data and to stop processing. We will also advise you on how to complain to the relevant authorities, namely the Information Commissioner's Office. Any requests or objections should be made in writing to the Data Controller or you can visit our website, call, or email us to contact us to change your preferences at anytime.

## Scope of Agreement

By visiting and/or submitting your personal data on this site or as required for us to provide products and services to you, you are affirming your agreement for such information to be used in accordance with this privacy policy. You will be able to change your preferences at any time by the methods described as prescribed in this document.

## Opting out at a later date

Where you give your consent for us to process your data, for example when you agree to us sending you marketing information or where you agree to us processing other personal data, you can contact us to amend or withdraw your consent at anytime. You can also choose to object to processing and request deletion of your data. We respect all user rights as defined in GDPR and DPA(2018). If you have any comments or wish to complain please contact us.

## How we store and process your data

As part of the services offered to you through our website, the information you provide to us may be transferred to and stored in countries outside of the United Kingdom as we use remote website server hosts to provide the website and some aspects of our service, which may be based outside of the UK, or use servers based outside of the UK . It may also be processed by staff operating outside the UK who work for our supplier, e.g. our website server development and hosting company.

A transfer of your personal data may happen if any of our servers are located in a country outside of the UK or one of our service providers is located in a country outside of the UK. If we transfer or store your personal data outside the UK in this way, we will take steps with the aim of ensuring that your privacy rights continue to be protected, as outlined in this Privacy Policy and in accordance with the GDPR.

Your data will be stored for up to 7 years or as described in our Data Retention policy, to ensure we have appropriate records of services, payments, and other interactions we have with you.

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 find out more about 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 a purpose unrelated to

the purpose for which we collected the data, we will notify you and we will explain the legal ground of processing.

We may be legally obliged to disclose your personal information without your knowledge to the extent that we are required to do so by law; in connection with any ongoing or prospective legal proceedings; in order to establish, exercise or defend our legal rights (including providing information to others for the purposes of fraud prevention and reducing credit risk); to any person who we reasonably believe may apply to a court or other competent authority for disclosure of that personal information where, in our reasonable opinion, such court or authority would be reasonably likely to order disclosure of that personal information.

You will only receive marketing communications from us if you have:

- Requested information from us,
- If you provided explicit consent at the point of entry of your details for us to send you marketing communications
- You have not opted out of receiving marketing

We will never sell or share your details for third party marketing purposes.

## Our obligations

We are a data controller. In relation to the information that you provide to us, we are legally responsible for how that information is handled. We will comply with the GDPR and DPA (2018) in the way we use and share your personal data. Under certain circumstances, you have rights under the data protection laws in relation to your personal data. These include the right to:

- Request access to your personal data.
- Request correction of your personal data.
- Request erasure of your personal data.
- Object to processing of your personal data.
- Request restriction of processing your personal data.
- Request transfer of your personal data.
- Right to withdraw consent.

You can see more about these rights at: <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/>

You will not normally 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.



We may need to request specific information from you to help us confirm your identity and in some cases we may request additional identity verification measures to ensure we can fulfil your right to access your personal data (or to exercise any of your other rights) safely and without risk to other data subjects. This is an important 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.

We aim 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.

### Third Parties

We may have to share your personal data with the parties set out below for the purposes described in this document:

- Our website hosting and development platform [wix.com Privacy Policy: <https://www.wix.com/about/privacy>]
- Google – Google Analytics [Privacy Policy - <https://policies.google.com/privacy?hl=en> ]
- We may store your data in DropBox cloud storage, for more information about how DropBox meet GDPR requirements and access to their Privacy Policy please visit: [https://www.dropbox.com/en\\_GB/security/GDPR](https://www.dropbox.com/en_GB/security/GDPR)
- Service providers who provide IT and system administration services.
- Professional advisers including our GDPR Consultant [Privacy policy – <https://optindigo.com> ], lawyers, bankers, auditors and insurers who provide consultancy, credit scoring, banking, legal, fraud protection, insurance and accounting services.
- HM Revenue & Customs, regulators and other authorities based in the United Kingdom and other relevant jurisdictions who require reporting of processing activities in certain circumstances.
- Third parties to whom we sell, transfer, or merge parts of our business or our assets.
- Third parties as required to provide our services to you and always as you would reasonable expect

We require all third parties to whom we transfer your data to respect the security of your personal data and to treat it in accordance with the law. We only allow such third parties to process your personal data for specified purposes and in accordance with our instructions. Where we transfer data outside the UK we will ensure appropriate security measures are in place and that the destination is considered to have adequate levels of protection or in the case of restricted transfers, that appropriate safeguards are in place.

Under the GDPR, we are also permitted to share some information with third parties who may use such data for non-marketing purposes (including credit and risk assessment and management, identification and fraud prevention, debt collection and returning assets to you).

## 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 such data. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We will report any breaches or potential breaches to the appropriate authorities within 24 hours and to anyone affected by a breach within 72 hours. If you have any queries or concerns about your data usage, please contact us.

This 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 our website, we encourage you to read the privacy notice of every website you visit.

## Social Media Links

The following data processing in connection with social media plug-ins is carried out on the basis of our overriding legitimate interests in an optimal presentation of our offer pursuant to Article 6 para. 1 lit. f of the GDPR.

### Facebook

Our website uses functions of the social network Facebook. This feature is provided by Facebook Inc, 1 Hacker Way, Menlo Park, California 94025, USA. ("Facebook"). In this context, Facebook servers are accessed in the USA. This tells Facebook that our website has been accessed using your IP address. If you have a Facebook account and are logged in to it while pressing the Facebook button displayed on our website, Facebook can associate the visit to our website with your Facebook account.

We point out that we as the provider of this website have no knowledge of whether and what information Facebook collects and uses. You can find detailed information on this in the provider's data protection policy under the following links: <https://www.facebook.com/about/privacy/update> Facebook utilizes [standard contract clauses](#), relies on the European Commission's [adequacy decisions](#) about certain countries, as applicable, and obtains consent for data transfers to the United States and other countries.

## Instagram

Our website uses functions of the social network Instagram. The Instagram is owned by Facebook, so the same information that we are gathering from Facebook, we are having for Instagram too.

We point out that we as the provider of this website have no knowledge of whether and what information Instagram collects and uses. You can find detailed information on this in the provider's data protection policy under the following links:

## Analysis and advertising tools

The following data processing in connection with analysis and advertising tools takes place – insofar as we do not refer separately to another legal basis – on the basis of our legitimate interests in a meaningful analysis of the user behaviour of our website visitors in order to optimise the website itself and the associated advertising. This is done on the basis of Art. 6 1 lit. f of the GDPR.

### Google Analytics

This website uses Google Analytics, a web analysis service. These are operated by Google Inc., 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA. ("Google"). In this context, Google servers are accessed in the USA. Google also complies with certain legal frameworks relating to the transfer of data, such as the European Union (EU)-US and Swiss-US Privacy Shield Frameworks. In order to effectively implement the strict UK data protection requirements, we have concluded an order processing agreement with Google.

When IP addresses are processed by Google Analytics, they are made anonymous. This means that these are usually reduced before a transmission outside the UK and in exceptional cases immediately after the transmission there. This anonymised data is used for the purpose of analysing the use of this website and providing other services in connection with this website. The collected data will not be merged with other data held by Google.

## Cookies

A cookie is a small file which asks permission to be placed on your computer's hard drive. Once you agree, the file is added and the cookie helps analyse web traffic or lets you know when you visit a particular site. Cookies allow web applications to respond to you as an individual. The web application can tailor its operations to your needs, likes and dislikes by gathering and remembering information about your preferences. We use traffic log cookies to identify which pages are being used. This helps us analyse data about webpage traffic and improve our website in order to tailor it to customer needs. We only use this information for statistical analysis purposes and then the data is removed from the system.

Overall, cookies help us provide you with a better website by enabling us to monitor which pages you find useful and which you do not. A cookie in no way gives us access to your computer or any information about you, other than the data you choose to share with us. You can choose to accept or

decline cookies. Most web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. This may prevent you from taking full advantage of the website.

As well as your ability to accept or reject cookies, we also require your permission to store cookies on your machine, which is why when you visit our site, you are presented with the ability to accept our terms of use, including the storage of cookies on your machine. Should you not accept then you are free to leave our website, at any time.

We use cookies on our website as required to keep the site secure and support our site and also to track your behaviour for marketing and statistical monitoring. For more information on the cookies we use please contact us or refer to the following sites for more information:

Wix.com - <https://support.wix.com/en/article/cookies-and-your-wix-site>

Google Analytics - <https://developers.google.com/analytics/devguides/collection/analyticsjs/cookie-usage>

## Contacting us, exercising your information rights and Complaints

If you have any questions or comments about this Privacy Policy, wish to exercise your information rights in connection with the personal data you have shared with us or wish to complain, please contact: Mark Ford at Gym Spa Soho Ltd. We will process SARs within 30 days, SAR responses are usually free but we reserve the right to charge for malicious, excessive or unfounded requests or in cases where we believe fulfilling the request could adversely impact the rights of our clients, other visitors, or staff. We fully comply with Data Protection legislation and will assist in any investigation or request made by the appropriate authorities.

If you remain dissatisfied then you have the right to apply directly to the Information Commissioner for a decision. The Information Commissioner can be contacted at:

Information Commissioner's Office  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF  
[www.ico.org.uk](http://www.ico.org.uk)

End of document.