

# MolyFit Ltd

## Privacy notice

|   |   |
|---|---|
| Summary.....  | 1 |
| General information .....                             | 2 |
| About this document .....                             | 2 |
| Our details .....                                     | 2 |
| How we protect your information .....                 | 2 |
| Your personal information and what we do with it..... | 3 |
| When you contact us.....                              | 3 |
| When you use our services .....                       | 3 |
| When you use our website .....                        | 4 |
| Other web-services used through our website .....     | 5 |
| Information about cookies.....                        | 5 |
| Legal claims and legal obligations.....               | 5 |
| Marketing .....                                       | 2 |
| Opt-out.....  | 2 |
| Storing and sharing your information .....            | 2 |
| How long we keep your information .....               | 3 |
| Sharing your information.....                         | 3 |
| Your rights.....                                      | 3 |

## Summary

- We have put in place appropriate systems to protect your information.
- We only use your information when we are allowed to do so.
- We use your information only to:
  - fulfil a legal obligation or obey a lawful instruction;
  - reply to your questions;
  - provide our services;
  - help our website function properly; and
  - pursue, or defend against, legal claims.
- The information we use will only ever include your name, contact details, any information you decide to tell us when you contact us, and certain information related to using our website and marketing emails (including your IP address, general location, whether you are logged into our website). More details are provided in the rest of this document.
- Where you have consented, you have the right to revoke that consent at any time by contacting to let us know.
- We only send marketing material to people who have signed up for our services and they can opt-out easily.
- We only share your information with third parties in very limited circumstances.
- You have a number of rights about your personal information, that are explained in detail below.

# General information

## About this document

All organisations that use people's personal information must explain how they use and protect that information. Organisations with websites must also explain to people how they manage website cookies, if they use them.

We do both of these things in this document. We explain what we do with your personal information when you make contact with us, use our website, or use one of our services. The section that deals specifically with cookies and other related issues can be found in the section about [using our website](#).

This document is not about getting your consent for something. Instead, it is designed to tell you what we do, why we do it, and what rights you have. We are not asking you to agree to anything. We will ask your consent for some things but it will be made very clear to you when that happens and why it is happening at that time.

This privacy notice will tell you:

- how to contact us;
- how we protect your information;
- how we get your information;
- what information of yours we use;
- why and how we use your information;
- why we are allowed to use your information;
- how long we keep your information;
- what rights you have over your information;
- whether we provide access to your information to other groups; and
- if we intend to transfer your information to another country.

## Our details

MolyFit Ltd is based in the UK. We provide fitness advice via book sales and online exercise videos. MolyFit Ltd's company number is 12254136. If you have any comments or queries, please email John Molyneux at [hello@molyfit.co.uk](mailto:hello@molyfit.co.uk) or by post at:

6 Jenkins Avenue  
Bricket Wood  
St Albans  
Hertfordshire  
United Kingdom  
AL2 3SB

Our website is provided by [A2 Hosting Inc](#). A2's privacy policy can be found [here](#).

If we make changes to this document, this will be posted on this webpage and, where appropriate, you will be notified by email, phone, or letter.

If you wish to complain to the Information Commissioner's Office, you may do so [here](#).

## How we protect your information

MolyFit Ltd is committed to protecting the privacy and security of your personal information:

- We follow the letter and the spirit of the principles of data protection and all related legislation including the EU General Data Protection Regulation and the UK's Data Protection Act 2018.

- We have policies and mechanisms in place to protect your information. For example, only those who need to see your information have access to it, people with access to your data who are not employed by Molyfit Ltd can only do things to your personal information when we give them express written instruction to do so, connections to our website are encrypted, all information is stored off-site using reputable companies, and devices used to access your information are kept securely encrypted.
- We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where necessary.
- We never sell access to the information we collect and hold about you.
- We only collect and use information needed to provide our services.
- We only collect and use the minimum necessary amount of information to provide our services.

## Your personal information and what we do with it

We will only collect and use your personal information for the reasons described below, unless we reasonably consider that we need to use it for another reason **and that reason is compatible with the original purpose**. If we need to use your personal information for an unrelated purpose, we will notify you and we will explain why we are allowed to do so.

### When you contact us

*How do we collect and use the information?*

- When you contact us, whether by email, post, or phone, we will automatically collect some information about you. What information is collected will depend on the way you made contact.

*What information do we collect and use?*

- If you email us, we will collect, store, and use your **email address and any other information you include in your email**, as appropriate.
- If you call us, we will collect, store, and use **your phone number and any other information you provide** if you leave a recorded message, as appropriate.
  - If you write to us, we will collect, store, and **use any information you include in your letter**, as appropriate.

*Why do we collect and use the information?*

- We use this information for two reasons: to be able to reply to your email, letter, or phone call and to respond to the content of your query or comment.

*Why are we allowed to collect and use the information?*

- We can use this information because we have a legitimate interest in doing so.
- We have concluded that we have this interest after assessing the information we use and the way we use it. Our assessment concluded that:
  - you would expect us to use your personal information to contact you and reply to your comments and queries and it will cause you no harm for us to do so;
  - it is necessary and reasonable for us to use your personal information like this;
  - there is no less intrusive way of achieving the result (i.e., replying to you);
  - the benefit of us using your personal information in this way falls equally to you and to us; and
  - if we did not use your information like this, our business would suffer greatly without any benefit to you.

### When you use our services

*How do we collect and use the information?*

- When you contact us through post, email, phone call, or our website, we will automatically collect and store some information in our filing, email, phone, and website systems.
- If you are a member and use our services, we will market to you (unless you opt-out; see below) and we use 'web beacons' to collect information about how you use our marketing emails.

*What information do we collect, store and use?*

- **Biographical and contact information:** at a minimum your name and email address. Depending on the situation, postal addresses or telephone numbers as well.
- **When you open our emails, your IP address, and browser or email client type:** this done using 'web beacons' in our marketing emails.

*Why do we collect and use the information?*

- Biographical and contact details are necessary to deliver the services we provide.
- To market products and services to you and understand how that marketing is working.

*Why are we allowed to collect and use the information?*

- We can use contact information because it is necessary for entering into and performing a contract between you and Molyfit Ltd.
- We can use contact information to market to you and information about your use of marketing emails to understand our marketing because we have a legitimate interest in doing so. We have concluded that our interest is legitimate because:
  - you would reasonably expect us to take these actions;
  - there are very limited risks to you when we do;
  - it causes you no harm;
  - the amount of information about you, and how we use it, is proportional; and
  - any intrusion that you might experience is brief and can be eliminated by telling us to stop marketing to you.

## **When you use our website**

This section includes references to 'cookies'.

Cookies are small pieces of information placed by websites on to electronic devices such as computers, smartphones, and tablets. These pieces of information are sent back to that website each time the user visits it. Cookies are widely used and allow websites to function in a number of different ways. For example, they allow website owners to understand more about how people use their websites, remember a website user's preferences, and permit logins. Cookies usually improve the browsing experience and make websites more efficient. They do not provide access to your electronic device.

More information about how to use cookies can be found in the section [below](#).

*How do we collect and use the information?*

- We automatically collect personal information about people who use our website. This is done using [Google Analytics](#) and other cookies.

*Why do we collect and use the information?*

- To make sure our website is able to function (this information is known as 'strictly necessary'); and
- To help us understand how our website is used by visitors.

*What information do we collect and use?*

- First-party cookies;
- data related to your device/browser;
- your IP address;
- your general geographical location;
- your on-site activities to measure and report statistics about user interactions on the website (e.g., pages visited and time spent on the website);
- aggregated information about what videos you watch;
- whether cookies are enabled and have been accepted (these are 'strictly necessary');
- whether you have logged in (this is 'strictly necessary').

### *Why are we allowed to collect and use the information?*

- For information that is not strictly necessary, we need your consent. When someone first uses our website, they will be asked whether or not they consent to the use of cookies.
  - If they say yes, cookies will be used and personal information will be collected and used.
  - If they do not say yes, cookies that are not strictly necessary will not be used and related information will not be collected.
  - Strictly necessary cookies will still be used even if website users do not agree to cookies.
- We have a legitimate interest in using strictly necessary cookies to collect certain personal information. We have concluded that our interest is legitimate because:
  - the cookies in question are absolutely necessary for us to communicate, provide a service you have requested, and to provide security for that service;
  - it is reasonable for us to use information like this, you would expect us to do so, and it will not harm you when use it in the way that we do;
  - there is no less intrusive way of allowing people to use the website and access the functions they want to access; and
  - the information used is not sensitive.

### *Do we transfer your information outside of the UK?*

- If you choose to consent to cookies, information collected by Google Analytics will be collected, stored, and used outside of the UK. We rely on the Privacy Shield Framework to transfer this information to Google. Google [is part](#) of the Privacy Shield Framework.

### Other web-services used through our website

We include on our website videos that are hosted by [Vimeo](#). When you click on one of these videos, Vimeo automatically collects some of your personal information. Vimeo's privacy policy can be found [here](#) and their cookie policy can be found [here](#).

In their privacy policy, Vimeo states that they

“automatically collect certain types of data when you use our services, regardless of whether you have an account. This data includes your IP address, technical information about your device (e.g., browser type, operating system, basic device information), the web page you visited or search query you entered before reaching us, and your activities. We may track your activities using cookies and similar technologies. By using our services, you agree to our use of these methods as set forth in our [Cookie Policy](#).”

### Information about cookies

We use Google Analytics. The Google privacy policy can be found [here](#). Information about how google uses cookies can be found [here](#). You can opt out of Google Analytics using [this tool](#).

You can find out more about cookies at [www.aboutcookies.org](http://www.aboutcookies.org) and [www.allaboutcookies.org](http://www.allaboutcookies.org).

Most web browsers allow users to prevent or limit the extent to which cookies are placed on their devices. You can do this by checking your browser privacy or cookie settings and changing them to suit the level of control you want. See the links below for how to do this for each of the most popular web browsers:

- [Chrome](#)
- [Edge](#)
- [Firefox](#)
- [Internet Explorer](#)
- [Opera](#)
- [Safari](#)

## **Legal claims and legal obligations**

### *How do we collect and use the information?*

- Using all the processes we described in the above three sections (*'When you use our services'* *'When you contact us'* and *'When you use our website'*)

*Why do we collect and use the information?*

- To pursue, and defend against, legal claims and to comply with legal obligations.

*What information do we collect and use?*

- If we need to defend or pursue a legal claim, or fulfil a legal obligation, we will use whatever personal information we have that is required. For legal claims this will be, at a minimum, your name and contact details. Other legal obligations will vary but include, for example, bank and payment details so we can fulfil our tax obligations.

*Why are we allowed to collect and use the information?*

- We are allowed to use personal information to pursue and defend against legal claims because it is in our legitimate interest to do so. We made this conclusion because:
  - the information is absolutely necessary for us to be able to pursue or defend against a legal claim;
  - it is reasonable for us to use information like this;
  - we would be expected to do so;
  - there is no less intrusive way of fulfilling this purpose.
- We are specifically required by law to keep and use certain information to fulfil various legal obligations, such as those relating to tax, employment law, and criminal investigations.

## Marketing

When people sign-up for our services, we collect their name and contact information (see [above](#)). We occasionally send people who use our services information about our products and services which we think they might be interested in.

We do not send marketing communications to people who are not subscribed to our services.

We do not market to businesses.

### Opt-out

You always have the right to 'opt-out' of receiving our marketing.

You can opt-out do this at any time by contacting us through our website (<https://www.molyfit.co.uk/about>) or by contacting John Molyneux at [hello@molyfit.co.uk](mailto:hello@molyfit.co.uk).

Marketing emails from Molyfit Ltd will always provide an unsubscribe option to allow you to opt out of any further marketing emails.

If you opt-out of our marketing materials you will be added to a list we keep of people who have opted-out. This is to make sure that we do not accidentally send you further marketing (for example, if you unsubscribe from our service and then re-subscribe). We sometimes need to contact you for administrative or operational purposes, but we will make sure that those communications don't include direct marketing.

We retain your details on our marketing list until you "opt-out" at which point we add you to our suppression list. We keep that suppression list indefinitely to comply with our legal obligations to ensure we don't accidentally send you any more marketing, unless you ask us to erase all your information.

## Storing and sharing your information

Molyfit Ltd is based in the UK.

Our webhost is A2 Hosting Inc. A2 Hosting Inc. is based in the USA and that is where our data is hosted. We rely on the Privacy Shield Framework to transfer the information to A2 Hosting Inc. A2 Hosting Inc. [is part](#) of the Privacy Shield Framework.

## How long we keep your information

To decide the correct amount of time that we will keep your information, we have considered the amount, nature, and sensitivity of your information, the potential risk of harm from its unauthorised use or disclosure, the purposes for which we use it, whether we can achieve those purposes through other means, and the applicable legal requirements.

Information we collect and use because we negotiated for, or entered into a **contract** is kept for a period of up to 6 years after your account is closed to enable us to deal with any after-sales enquiries or claims and as required for tax purposes.

Information we collect and use **because you used our website**: we keep this information about you for up to 12 months from when it is collected or the relevant cookie expires (see [here](#) for more information about the exact cookies we use).

Where your **information is collected by Vimeo**, through our site, it will be retained by them in accordance with their policies.

Information collected and used as a consequence of **you contacting us** for reasons other than that we have negotiated or entered into a contract is kept for up to 6 years.

## Sharing your information

We sometimes give access to your information to third parties. Third parties are required to respect the security of your personal information and to treat it in accordance with the law. If the third parties are using your personal information on our behalf as 'data processors' then they must comply with a number of specific contractual requirements to protect your information. These include that they only act on our written instructions and that they agree to treat the information confidentially and keep it secure.

We give access to your personal information to third parties if:

- it is part of delivering our service to you (e.g., website hosting);
- we have a legal duty to do so (e.g., where we are compelled by law enforcement agencies); or
- we need to use the information for our own legal proceedings.

## Your rights

You have a number of rights about personal information we hold about you. They are described briefly below. More information about your rights can be found on the webpage of the Information Commissioner's Office (ICO). Under some circumstances, by law you have the right to:

- **Be informed** in a clear, transparent and easily understandable way about how we use your personal information and about your rights. If you need more information about how we use your personal information, please let us know.
- **Request access** to your personal information (this is known as a 'data subject access request'). This right lets you receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- **Request correction** of the personal information that we hold about you. This lets you correct any incomplete or inaccurate information we hold about you.
- **Request erasure** of your personal information. This means you can ask us to delete or remove personal information where there is no good reason for us continuing to store or use it. An example of a good reason for us to keep it is to continue to comply with our legal obligations. You can also ask us to delete or remove your personal information where you have exercised your right to object to us storing or using or your personal information (see below).
- **Object to us storing or using** your personal information where we rely on a legitimate interest (or those of a third party) and there is something about your situation which makes you want to object to us using your information on this basis. We might have a compelling legitimate basis for doing so which overrides your rights, interests and freedoms, in which case your objection may not be accepted. For example, we may need your personal information to defend a legal claim. You also have the right to object where we are processing your personal information for direct marketing purposes.
- **Request the restriction** of the storage or use of your personal information. This allows you to ask us to temporarily stop what we are doing with your personal information. For example, if you want us to establish the accuracy of your personal information.

- **Request the transfer** of your personal information to another party where you provided it to us and we are using it based on your consent, or to carry out a contract with you, and we process it using automated means.
- **Withdraw consent.** If we rely on your consent to collect and use your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another compelling legitimate interest in doing so.
- **Lodge a complaint.** If you think that we are using your information in a way which breaches data protection law, you have the right to lodge a complaint with your national data protection supervisory authority (if you are in the UK, this will be the ICO).

**If you want to contact us** to review, verify, correct, request erasure, object, withdraw your consent, or request that we transfer a copy of your personal information to another party, please contact us at [hello@molyfit.co.uk](mailto:hello@molyfit.co.uk) or through our website at <https://www.molyfit.co.uk/about>.

**No fee is usually required.** You will not have to pay to access your personal information or to exercise any of the other rights. However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive.

**What we may need from you.** We may need to request specific information from you to help us understand the nature of your request, to confirm your identity, and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it. If we request any identification from you for this purpose, it is on the basis that it is necessary to comply with our legal obligations, and we will only keep and use this until your identity has been verified.

**Timescale.** We will respond to your request as soon as we can. This should be within one calendar month from when we receive your request but, if the request is going to take longer to deal with, we will let you know. For example, if identification is necessary, the time limit will be from the day we receive that information.