



## Privacy Policy (Version 1)

This is the Bumblebee Wellbeing privacy policy.

### DEFINITIONS

- **Product** means any goods, services or digital content displayed for sale on the Website.
- **Personal Information** means the details provided by you on registration.
- **We/us** means Bumblebee Wellbeing Limited a company registered in England and Wales. Our company registration number is 11539779 and our registered office is at First Floor, Telecom House 125-135 Preston Road, Brighton, East Sussex, BN1 6AF.
- **Website** means the website located at [www.bumblebeewellbeing.health](http://www.bumblebeewellbeing.health) or any subsequent URL which may replace it

### INTRODUCTION

**Purpose.** We respect your privacy and are committed to protecting your personal data. This privacy policy aims to give you information on how we collect and process your personal data either through your use of this Website (regardless of where you visit it from), including any data you may provide through our Website, for example, when you sign up to our newsletter or purchase any Products, or in the other ways you may share information with us – by text message, telephone, mail, or in person.

Personal data, including 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, for example, anonymous data.

This document tells you about how we look after your personal data when you visit our Website or you provide personal information to us in other ways and tells you about your privacy rights and how the law protects you.

This Website is not intended for children below 13 years of age 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 policy 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 other notices and privacy policies and does not override them.

**Controller.** Bumblebee Wellbeing Limited is the controller and responsible for your personal data.

If you have any questions about this privacy policy, including any requests to exercise your legal rights, or if you have any questions about this privacy policy or our privacy practices, please email us at [info@bumblebeewellbeing.com](mailto:info@bumblebeewellbeing.com) or speak to us on +44 7768 050 392 or write to us at our registered office address.

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**

We keep our privacy policy under regular review. 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**

Our 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 policy of every website you visit.

### **THE DATA WE COLLECT ABOUT YOU, FOR WHAT PURPOSE AND ON WHAT GROUNDS WE PROCESS IT**

We will only use your personal data when the law allows us to and for the purpose for which we collected it. Most commonly, we will use your personal data in the following circumstances:

- where we need to perform the agreement 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 obligation.

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.

Specifically, we may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- **Communication Data** includes any communication that you send to us whether through our Website, through email, text, social media messaging, social media posting or any other communication that you send us. We process this data for the purposes of communicating with you, for record keeping and for the establishment, pursuance or defence of legal claims. Our lawful ground for this processing is our legitimate interests, which in this case are to reply to communications sent to us, to keep records and to establish, pursue or defend legal claims.
- **Customer Data** includes first name, maiden name, last name, username or similar identifier, marital status, title, date of birth and gender, details about payments to and from you, including bank account and payment card details, and other details of products and services you have purchased from us, and your billing address, delivery address, email address and telephone numbers. We process this data to supply the Products you have purchased and to keep records of such transactions. Our lawful ground for this processing

is the performance of a contract between you and us and/or taking steps at your request to enter into such a contract.

- **Marketing Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences. We process this data to enable you to partake in our promotions such as competitions, prize draws and free give-aways, to deliver relevant Website content and advertisements to you and measure or understand the effectiveness of this advertising. Our lawful ground for this processing is our legitimate interests, which in this case are to study how customers use our Products/services, to develop them, to grow our business and to decide our marketing strategy.
- **Profile Data** includes your username and password, purchases or orders made by you, your interests, preferences, feedback and survey responses. We process this data for the purposes of communicating with you, to enable you to use the Website and interact with its contents, and for record keeping and for the establishment, pursuance or defence of legal claims. Our lawful ground for this processing is our legitimate interests, which in this case are to manage the interaction with our on our Website, to keep records and to establish, pursue or defend legal claims.
- **Technical Data** includes internet protocol (IP) address, your login data, details about your browser type and version, length of visit to pages on our Website, page views and navigation paths, details about the number of times you use our Website, 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 this Website. The source of this data is from our analytics tracking system. We process this data to analyse your use of our Website and other online services, to administer and protect our business and Website, to deliver relevant Website content and advertisements to you and to understand the effectiveness of our advertising. Our lawful ground for this processing is our legitimate interests which in this case are to enable us to properly administer our Website and our business and to grow our business and to decide our marketing strategy.
- **User Data** includes information about how you use our Website, Products and services, together with any data that you post for publication on our Website or through other online services. We process this data to operate our Website and ensure relevant content is provided to you, to ensure the security of our Website, to maintain back-ups of our Website and/or databases and to enable publication and administration of our Website, other online services and business. Our lawful ground for this processing is our legitimate interests, which in this case are to enable us to properly administer our Website and our business.

**Aggregated Data.** We also collect, use and share aggregated data such as statistical or demographic data for any purpose. Aggregated Data could be derived from your personal data but is not considered personal data in law as this data does not 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.

**Special Categories of Personal Data.** In some instances, we collect the following special categories of personal data about you. We will always seek your specific consent before we collect, use, store and transfer this data.

- Information about your health or ethnic origin, health, genetic and biometric data, sex life or sexual orientation. We process this data to ensure that the Products we supply to you are tailored to your particular health situation and to ensure we can work effectively with any other medical or health care professionals who are advising or working with you.

We do not collect any information about criminal convictions and offences.

We do not carry out automated decision making or any type of automated profiling.

### **IF YOU FAIL TO PROVIDE PERSONAL DATA**

Where we need to collect personal data by law, or under the terms of an agreement we have with you, and you fail to provide that data when requested, we may not be able to perform the agreement 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.

### **HOW WE COLLECT YOUR PERSONAL DATA**

**Direct interactions.** We may collect data about you by you providing the data directly to us, for example, by filling in forms on our site, by sending us emails or text messages, or creating an account on our Website. We may automatically collect certain data from you as you use our Website by using cookies and similar technologies.

**Automated technologies or interactions.** As you interact with our Website, we will automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies and other similar technologies.

**Third parties or publicly available sources.** We may receive data from third parties such as analytics providers such as Google based outside the EU, advertising networks such as Facebook based outside the EU, such as search information providers such as Google based outside the EU, providers of technical, payment and delivery services, such as data brokers or aggregators.

### **MARKETING**

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising. We have established the following personal data control mechanisms:

**Promotional offers from us.** We may use your Communication, Customer, Profile, Marketing, Technical and User 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 Products, services and offers may be relevant for you.

You will receive marketing communications from us if you have requested information from us or purchased and Products from us and 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 third party for marketing purposes.

**Opting out.** You can ask us or third parties to stop sending you marketing messages at any time by logging into the Website and checking or unchecking relevant boxes to adjust your marketing preferences, 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 a Product purchase, Product/service experience or other transactions.

### **COOKIES**

**What are cookies?** Cookies are tiny text files stored on your computer when you visit certain web pages. We use cookies to keep track of what you have in your basket, and to remember you when you return to our site.

If you don't wish to enable cookies on your computer, that will mean that your experience of using our Website site will be impaired - as some of the cookies help us to identify and resolve errors for example, or determine relevant related Products to show you when you're browsing. Most web browsers have cookies enabled. For help to turn them on should you need to, see the Managing Cookies section below.

We may have relationships with third parties who may also set cookies during your visit to be used for remarketing purposes - in other words to show you different Products and services based on what you appear to be interested in. If you'd like to opt out, please go to the [Network Advertising Initiative website](#) (opens in a new window - please note that we're not responsible for the content of external websites).

**Do not track.** Do not track (DNT) is a feature offered by some browsers, with some newer browsers offering it as default. If you enable it, it sends a signal to websites to request that your browsing isn't tracked, for example by third party ad or social networks, or analytic companies.

You can opt out of tracking and analytics on this Website by changing your, see the Managing Cookies section below.

At present no industry-wide uniform standard has been agreed and adopted to determine how DNT requests should be managed. We are providing this information to you to make sure we're honest and clear about your privacy when using our Website.

**Managing cookies.** How to check cookies are enabled on iOS Safari

1. Tap on the 'Settings' application from your home screen.
2. Find and tap on the 'Safari' menu item.
3. Under the 'Privacy & Security' section tap on the 'Block cookies' menu item.
4. Select any option other than 'Always block'.

How to check cookies are enable on Android internet browsers

1. Tap on the 'Settings' application from your home screen or under 'Apps'.
2. Under the 'Device' section tap on the 'Applications' menu item.
3. Find and tap the 'Internet' menu item.
4. Find and tap the 'Privacy' menu item.
5. Enable 'Accept cookies'.

For all other browsers, please consult your online Help files.

## **DISCLOSURES OF YOUR PERSONAL DATA**

We may share your personal data with the parties set out below:

- Medical or health care professionals who are advising or working with you.
- Service providers who provide IT and system administration services.
- Service providers who provide marketing communications, project management, financial or qualification and certification services.
- Professional advisers including lawyers, bankers, accountants, auditors and insurers.
- Government bodies that require us to report processing activities.
- Third parties to whom we sell, transfer, or merge parts of our business or our assets.

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.

### **INTERNATIONAL TRANSFERS**

Countries outside of the European Economic Area (**EEA**) do not always offer the same levels of protection to your personal data, so European law has prohibited transfers of personal data outside of the EEA unless the transfer meets certain criteria.

Many of our third parties service providers 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 do our best to ensure a similar degree of security of data by ensuring at least one of the following safeguards is in place:

- We will only transfer your personal data to countries that the European Commission have approved as providing an adequate level of protection for personal data by; or
- Where we use certain service providers, we may use specific contracts or codes of conduct or certification mechanisms approved by the European Commission which give personal data the same protection it has in Europe; or
- If we use US-based providers that are part of EU-US Privacy Shield, we may transfer data to them, as they have equivalent safeguards in place.

If none of the above safeguards is available, we may request your explicit consent to the specific transfer. You will have the right to withdraw this consent at any time.

### **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.

We also allow access to your personal data only to directors, officers, employees and / or any contractor or agents engaged by us or other third parties, in each case 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.

### **DATA RETENTION**

**How long will you use my personal data for?** We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

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, regulatory, tax, accounting or other requirements.

For tax purposes the law requires us to keep basic information about our customers (including Customer, Financial, User Data) for six years after they stop being customers.

In some circumstances we may anonymise your personal data for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

## **YOUR LEGAL RIGHTS**

**Your rights.** Under certain circumstances, you have rights under data protection laws in relation to your personal data, including the right to request access, correction, erasure, restriction, transfer, to object to processing, to portability of data and (where the lawful ground of processing is consent) 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/>

**Exercising your rights.** If you wish to exercise any of the rights set out above, please email us at [info@bumblebeewellbeing.com](mailto:info@bumblebeewellbeing.com) or speak to us on +44 7768 050 392 or write to us at our registered office address.

**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 could 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.

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.