# DOWNW/&RD DOG

# **Privacy Policy**

Last updated: 17/11/2023

Downward Dog ("the Company", "us", "we", or "our"), operates the website www.downwarddog.uk We may change or add to this privacy notice, so we encourage you to come back and read it periodically. Downward Dog is the data controller that resides at Studio 1-2, 75 Queens Road Unit 1A, Buckhurst Hill London IG9 5BW.

This privacy notice governs the website Downward Dog and informs you of our policies regarding the collection, use, and disclosure of personal data when you use our services and the choices you have associated with that data. Your privacy is very important to us.

We use your data to provide and improve our site and the services we offer. By using the site and our services, you agree to the collection and use of information in accordance with this policy.

#### **DATA WE COLLECT**

While using our site we may ask you to provide us with certain personal data that can be used to contact or identify you ("Personal Data"). Personal Data may include, but is not limited to:

- Email address
- First name and last name
- Phone number

For customers who use our services, in addition to the above data, we may also collect further, voluntary information to enable us to provide our service in an optimized manner. Some data collected from clients may include:

- Health-related information
- Emergency contact name and phone number

#### 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 do not 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 and/or services). In this case, we may cancel a product and/or service you have with us, but we will notify you if this is the case at the time.

#### **Opting Out**

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

Note when you opt-out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a product/service purchase, product/service experience or other transactions.

#### **HOW WE USE YOUR INFORMATION**

We may use the information that we collect about you to:

- **Provide our products and services.** We will use your information to provide our products and services to you.
- Understand and improve our products and services. We will perform research and analysis about your use of, or interest in, our products, services, or content. We do this to help us improve our products and services.
- Communicate with you. We may send you emails about our product and services or other news about us or on topics we think would be relevant to you. You may opt out of these at any time. See the Your Choices section below for details.

• **Responding to your requests.** We will also use your information to respond to your questions or comments.

We may contact you to inform you about changes in our services, our service offering and other important service-related notices such as changes to the privacy policy or about security or fraud notices.

We may develop and display content and advertising tailored to your interests in our products and services on our site and on other sites.

We also may use your information to manage our business or perform functions as otherwise described to you at the time of collection.

#### **Sharing and Disclosure**

We do not share your personal information with others except as indicated within this policy or when we inform you and give you an opportunity to opt out of having your personal information shared.

We will share your information in the following ways

With third party service providers, agents, or contractors. We use other companies, agents or contractors ("Service Providers") to perform services on our behalf or to assist us with providing services to you. For example, we may engage Service Providers to process credit card transactions or other payment methods. Or, we may engage Service Providers to provide services such as marketing, advertising, communications, infrastructure and IT services, to provide customer service, to collect debts, and to analyse and enhance data (including data about users' interactions with our service). These Service Providers may have access to your personal or other information in order to provide these functions. In addition, some of the information we request may be collected by third party providers on our behalf. We do not authorize them to use or disclose your personal information except in connection with providing their services.

Analytics: Specifically for analytics providers, we use Google Analytics Google Analytics which is a web analytics service offered by Google that tracks and reports website traffic. Google uses the data collected to track and monitor the use of our Service. This data is shared with other Google services. Google may use the collected data to contextualize and personalize the ads of its own advertising network.

You can opt-out of having made your activity on the Service available to Google Analytics by installing the Google Analytics opt-out browser add-on. The add-on prevents the Google Analytics JavaScript (ga.js, analytics.js, and dc.js) from sharing information with Google Analytics about visits activity. For more information on the privacy practices of Google, please visit the Google Privacy & Terms web page: <a href="https://www.google.com/intl/en/policies/privacy/">https://www.google.com/intl/en/policies/privacy/</a> Google also recommends installing the Google Analytics Opt-out Browser Add-on – <a href="https://tools.google.com/dlpage/gaoptout">https://tools.google.com/dlpage/gaoptout –</a> for your web browser. Google Analytics Opt-out Browser Add-on provides visitors with the ability to prevent their data from being collected and used by Google Analytics.

Payment Providers: We may provide paid products and/or services within the site. When we do, we use third-party services for payment processing (e.g. payment processors). We will not store or collect your payment card details. That information is provided directly to our third-party payment processors whose use of your personal information is governed by their own privacy notice. The payment processors we work with adhere to the standards set by PCI-DSS as managed by the PCI Security Standards Council, which is a joint effort of brands like Visa, Mastercard, American Express and Discover. PCI-DSS requirements help ensure the secure handling of payment information.

To comply with legal process or to protect Downward Dog: If we believe that disclosure is reasonably necessary to comply with a law, regulation, legal or governmental request; to enforce applicable terms of use, including investigation of potential violations thereof; to protect the safety, rights, or property of the public, any

person, or Downward Dog as required by law; or to detect, prevent, or otherwise address, security or technical issues or illegal or suspected illegal activities (including fraud).

#### **Links to Other Sites**

We may have links on our site to other sites that we do not operate. If you click on a third-party link, you will be taken directly to that site which is governed by its own privacy notice. We strongly encourage you to read that privacy notice. We do not control that site and assume no responsibility for the content, policies or its practices.

#### Retention

Downward Dog will retain your Personal Data only for as long as is necessary for the purposes set out in this Privacy Notice. We will retain and use your Personal Data to the extent necessary to comply with our legal obligations (for example, if we are required to retain your data to comply with applicable laws), resolve disputes, and enforce our legal agreements and policies.

Downward Dog will also retain Usage Data for internal analysis purposes. Usage Data is generally retained for a shorter period of time, except when this data is used to strengthen the security or to improve the functionality of our Service, or we are legally obligated to retain this data for longer time periods.

# **Choices and Individual Rights:**

We aim to take reasonable steps so you can correct, amend, delete or limit the use of your Personal Data.

You have the following choices:

• **E-mail**. As described above, if you do not wish to receive promotional e-mails from us, you may opt out at any time.

- Your browser's help function should contain instructions on how to set your computer to accept all cookies, to notify you when a cookie is issued, or to not receive cookies at any time.
- You can opt out of online targeted advertising by opting out within the advertisement itself or by visiting <u>Digital Advertising Alliance</u>, http://www.aboutads.info/, the Digital Advertising Alliance of Canada in Canada http://youradchoices.ca/ or the European Interactive Digital Advertising Alliance in Europe <a href="https://www.youronlinechoices.eu/">https://www.youronlinechoices.eu/</a>. You can also opt out of the Digital Advertising Alliance using your mobile device settings.

## Your rights under certain circumstances:

- To access and receive a copy of the Personal Data we hold about you.
- To rectify any Personal Data held about you that is inaccurate
- To request the deletion of Personal Data held about you

You have the right to data portability for the information you have provided to us. You can request to obtain a copy of this information in a commonly used electronic format so that you can manage and move it. We will need to verify your identity before being able to respond to such requests. Please contact us at <a href="mailto:monika@downwarddog.uk">monika@downwarddog.uk</a>

#### Your legal rights

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

#### You have the following data protection rights:

Your right of access to your personal data (commonly known as a "data subject access request"). This enables you ask us for copies of the personal data we hold about you.

Your right of rectification of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected.

Your right to 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.

Your right to object to the 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 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.

Your right to request the 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:

- If you want us to establish the data's accuracy.
- Where our use of the data is unlawful but you do not want us to erase it.
- 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.
- You have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

Your right to 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.

Your right to 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 email us at monika@downwarddog.uk

## No fee usually required

We will not charge you 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, vexacious or excessive. Alternatively, we could refuse to comply with your request in these circumstances.

#### What we may need from you

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

#### Security

We believe we use reasonable administrative, logical, physical and managerial measures to safeguard your personal information against loss, theft and unauthorized

access, use and modification. Unfortunately, no measures can be guaranteed to provide 100% security. Accordingly, we cannot guarantee the security of your information.

Our policy on children's information

Our site is not directed to children under 16. If you learn that your minor child has provided us with personal information without your consent, please contact us.

**Changes to the Policy** 

We may change this policy from time to time, and if we do make changes, we'll post any changes on this page. If you continue to visit our site after those changes are in effect, you agree to the revised policy. If the changes are significant, we may provide more prominent notice or get your consent on the new policy.

**Contacting Us** 

If you have any questions or comments about this policy, please contact us at monika@downwarddog.uk

Disclaimer:

This policy may be changed at any time at Downward Dog's discretion. If we should update this policy, we will post the updates to this page on our website.

This policy was last updated: 17/11/2023

If you have any questions or concerns regarding our privacy policy please direct them to Monika Gago-Patel at monika@downwarddog.uk You may also send a letter to: Studio 1-2, 75 Queens Road Unit1A, Buckhurst Hill, London IG9 5BW