

# Privacy Policy

We are **Muve Live Ltd** (registered in England with company number 11798781(as Data Controller) (collectively **we** or **us**). Our registered office and main trading address is at Unit 1 The Barns Mill Lane, Snelson, Macclesfield, Cheshire, England, SK11 9BN.

We are committed to protecting and respecting your rights to data protection and privacy.

This policy (together with our Terms and Conditions and any other document referred to in it explains the basis upon which we use or “process” any personal data which we collect from you, which you provide to us or which may be provided to us from any third parties, and the choices which you can make about the way in which that information is collected and used. To better protect your privacy and make this notice easy to find, we make it available from our platform and at every point at which we may request personal information from you.

Please read this policy, and any document referred to in it carefully to understand how we and our trusted partners use your personal data and protect your rights to data protection and privacy. When visiting the MuveLive platform (**the platform** or **our platform**), we will provide you with details of the data processing we undertake, this will be provided in this privacy policy and the other documents noted or linked to from this privacy policy and in the consents we request from you to process your data (for example, we may require your consent to create your account and for certain marketing purposes).

## **Controller**

Controller

Muve Live Ltd is a controller of personal data it obtains and processes as a business for its own means and purposes. This will include any data we obtain from you that we use for billing, managing our relationship with you, the data we obtain to help us improve our services and any data that we use for things like marketing and analytics (see the section below titled "**Information which we collect from you**" for further information).

## **Third Party Controllers**

In certain circumstances we may share your personal data with trusted third parties. We will only do this where we have a lawful basis to do so. The lawful basis we rely on include:

- Where there is a **legal requirement** to share your personal data (e.g. because we are required to by law);
- Where we have **legitimate interests** to share your personal data and you have been informed of the purpose for sharing the data;
- Where you provide your **consent** to your data being shared with those third parties.

Where we share your personal data with third parties using one of the lawful basis mentioned above, those third parties will be independent controllers (or sometimes joint controllers) of your data, where they decide the means and purposes of processing your personal data (or jointly determine the means and purpose of the processing with Muve Live Ltd).

See the "**Uses made of the information**" and "**Disclosure of your information**" sections below for further information.

### **Consents / Permissions**

Where we require your consent to process personal data as a data controller or where we share that data with other data controllers (trusted third parties), we will inform you of the data we wish to process and will always ask for your consent before processing that data.

It is important to note that device permissions are separate to the consents we obtain within the Muve Live platform to use this data as a data controller for our own purposes. Generally, you can tell the difference between a consent and a permission based on where you receive the request.

- **Device Permissions** - A device permission will often appear before you enter the Muve Live platform or will be accessible in your device's privacy settings.
- **Muve Live Consents** – Where we require your consent to process data for our own purposes (as data controller), these will appear within the Muve Live platform account registration process.

Where your device provides application permission controls, they can be utilised at any time to prevent / allow the Muve Live platform to access certain types of data and will effect the data accessible by the Muve Live platform as a whole, not just the data processed by Muve Live Ltd as a data controller.

### **Information which we collect from you**

We will collect and process the following data about you:

- **Information which you give to us.** This is information about you that you give us by creating an account with us or by filling in forms on our platform or by communicating with us by phone, e-mail or otherwise (including via social media). It includes information you provide when you register to use our platform and our services, search for online classes, and when you report a problem with our services.

The information customers give us to set up their account may include, and is not limited to, name, email address, preferred method of payment.

The information instructors give us may include, and is not limited to, name, email address, payment details, professional and academic qualifications and insurance details.

On some pages, you can submit information about other people. For example, you may wish to provide emergency contact details of your next of kin or contact details of referrals you wish to make. In this case, it is your responsibility to ensure that you have the right to share this personal data with us.

- **Information which we collect about you.** With regard to your use of our platform and to each of your visits to our platform we will collect the following information from your device:

- internet protocol (IP) address used to connect your device to the internet and access our platform
- technical information, including (without limitation) the type of mobile device you use to access our platform, a unique device identifier (for example, your device's IMEI number, the MAC address of the device's wireless network interface, and/or the mobile phone number used by you device), mobile network information, your mobile operating system, the type of mobile browser you use, or time zone setting, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform etc.;
- information about your visit, including the full Uniform Resource Locators (URL), clickstream to, through and from our platform (including date and time), products/services you viewed or searched for, page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), methods used to browse away from the page, and any phone number used to call our customer service number.

- **Information which we receive from other sources.**

## **Cookies**

Our platform uses cookies to distinguish you from other users of our platform. This helps us to provide you with a good experience when you browse our

app and also allows us to improve our app. For detailed information on the cookies we use and the purposes for which we use them see our Cookie policy.

### **Uses made of the information**

We use information held about you in the following ways both to enable us to provide the Muve Live platform and facilitate the financial transactions in question. These are categorised depending on our legal reasons for doing so:

- Co – Consent – this is where you provide your permission for us to use this data;
- LI – Legitimate Interests – this is where we have legitimate interests as a business in undertaking certain tasks;
- PC – Performing our contract with you – this is where we undertake tasks to deliver the platform, services and other responsibilities to you; and
- LR – Where we have a legal requirement to process your data.

Where this is based on your consent, you can withdraw this any time, please see the section entitled “Your Rights” below but in some cases we will be unable to continue to provide the app and/or services to you).

**Information which you give to us.** We will use this information to:

- host, manage and provide access to the online platform that delivers and streams fitness and health classes for instructors (PC) and users (Co)
- maintain and improve the services provided via the platform, improve the platform's security and user experience (LI)
- set up and manage the accounts of instructors (PC)
- set up and manage the accounts of customers (Co)
- process the payment of the instructors and our payment (PC)
- maintain records about your financial transactions in line with our legal obligations, including fraud prevention (LR)
- comply with our legal and regulatory requirements (LR);
- assist our trusted third parties to provide their services / fulfil their obligations to you (for example, we need to provide personal data of users to instructors for billing purposes). They will process your personal data for their own means and purposes, however we will rely on our own lawful basis to share the information (see the "Controller" section above for further information) (PC).

**Information we collect about you.** We will use this information:

- to administer our devices and/or platform and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes (LI);

- to improve our platform to ensure that content is presented in the most effective manner for you and for your device (LI);
- to allow you to participate in interactive features of our platform and our services, when you choose to do so (LI);
- as part of our efforts to keep our platform safe and secure (LI);
- to make suggestions and recommendations to you and other users of our platform about goods or services that may interest you or them (LI);
- to comply with our legal and regulatory requirements (LR and/or LI);

**Social Login details.** We may allow you to create, authorise and sign into our platform using a third party platform such as Amazon, Twitter and/or Facebook. By using those third-party services to do so, you confirm that you agree to their terms of use, privacy policy and any other agreements or documents which set out the terms of your relationship with them and use of their services, which is separate from your relationship with us and your use of our app and authorise us to share your personal data with any third party website or app provider to which your account is linked. You also authorise us to retrieve and/or receive and/or access your personal data held by any third party website or app provider to which your account is linked which is relevant to our app and services, and agree to the transmission, storage, processing and use by us of your personal data retrieved and/or received from any third party website or app provider to which your account is linked in the manner set out in this Privacy Policy. This paragraph of this policy applies in relation to personal data that is held by any third party website or app provider and that is retrieved and/or received by us or is otherwise transmitted to us and such personal data constitutes user submitted or generated content which is uploaded, posted or otherwise transmitted to us.

**Information which we receive from other sources.** We will combine this information with information you give to us and information we collect about you. We will use this information and the combined information for the purposes set out above (depending on the types of information we receive).

### **Disclosure of your information**

We will share your personal information or derivatives of it with:

- Selected third parties including:
  - o business partners, payment service providers, suppliers and sub-contractors for the performance of any contract we enter into with them or you;

We will disclose your personal information to third parties:

- In the event that we sell or buy any business or assets, in which case we will disclose your personal data to the prospective seller or buyer of such business or assets.

- If we or substantially all of its assets are acquired by a third party, in which case personal data held by it about its customers will be one of the transferred assets.
- If we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our terms of use or terms and conditions of sale and other agreements; or to protect the rights, property, or our safety or the safety of our customers, our customers, staff and suppliers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.
- In order to market either our or our trusted third party products and services, or for those third parties to market directly to you where you have provided your consent.

### **Where we store your personal data**

The data that we hold about you may be transferred to, and stored at, a destination outside the UK, It will also be processed by staff operating outside the UK who work for us or for one of our suppliers. This includes staff engaged in, among other things, the fulfilment of your order, the processing of your payment details and the provision of support services. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy.

### **Security**

All information you provide to us is stored on our secure servers. Any payment transactions will be encrypted using SSL technology. Where we have given you (or where you have chosen) a password which enables you to access our app and our services, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our platform and our services; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

To prevent unauthorised access, maintain data accuracy, and ensure the correct use of information, we have put in place appropriate physical, electronic, and managerial procedures to safeguard and secure the information we collect online. Access to the information which you have provided will be limited to authorised employees as required for the purposes identified above as well as IT security and maintenance.

Any personal information you provide may be used to verify your identity and assist us in preventing or detecting fraud. As part of these checks your

information may be disclosed to credit reference agencies, who may keep a record of that information.

## **Retention of your data**

We will retain your personal data on our systems for as long as you continue to use our services. This is based upon our need to maintain a record of your personal data for the purposes set out in this policy and Terms and Conditions and based upon the period of limitation in any legal claim (in relation to which we may need access to or be compelled to disclose personal data relating to you) being a maximum of 6 years after last use of the platform or contact with us.

## **Your rights**

You have the right to be informed of how we make use of your personal data in a transparent form when we collect that data from you, which is set out in this policy.

You have the right to lodge any complaint relating to our processing of your personal data with the relevant supervisory authority, which is the Information Commissioner's Office. Their website can be found at [www.ico.org.uk](http://www.ico.org.uk). However if you do have any concerns we would welcome the opportunity to resolve them with you first – please get in touch at [hello@muvelive.com] and we will do our best to resolve them.

You have the right to withdraw your consent to any of the processing of your personal data as described in this privacy policy at any time, either by changing your privacy settings or by contacting us at [hello@muvelive.com]. As we note above, withdrawing your consent for certain processing may mean we are unable to continue to provide the services to you.

You have the right to have any personal data which we hold and which relates to you rectified or corrected if it is inaccurate or incomplete.

You have the right a right to have any personal data which we hold relating to you erased and to prevent its processing in specific circumstances, namely:

- Where the personal data is no longer necessary in relation to the purpose for which it was originally collected/processed;
- When you withdraw your consent to our processing of your personal data;
- When you object to our processing of your personal data and there is no overriding legitimate interest for that processing to continue;
- Where that personal data was unlawfully processed;
- Where that personal data has to be erased in order to comply with a legal obligation; and



- Where that personal data is processed in relation to the offer of information society services to a child under the age of 16.

You have the right to “block” or suppress our processing of personal data relating to you in the following circumstances:

- Where you contest the accuracy of the personal data, in which case we will restrict any further processing until we have verified its accuracy.
- Where you object to the processing of personal data and we are considering whether our legitimate grounds for its processing override that objection.
- When our processing of your personal data is unlawful and you ask for its processing to be restricted rather than deleted.
- If we no longer need personal data, but you need the data to establish, exercise or defend a legal claim.

You have the right to obtain and reuse your personal data held by us for your own purposes across different services in a safe and secure way without any negative effect upon its usability via a structured, commonly-used and machine-readable form, free of charge (in certain circumstances). You can ask us to transmit that data either directly to another organisation (provided that it is technically-feasible), or to send it directly to you.

You have the right to object to our processing of your personal data based on our legitimate interest in doing so (i.e. where we set out "(LI)" above. You also have the right to ask us not to process your personal data for marketing purposes. We will usually inform you (before collecting your data) if we intend to use your data for such purposes or if we intend to disclose your information to any third party for such purposes. You can exercise your right to prevent such processing by checking or unchecking certain boxes on the forms we use to collect your data. You can also exercise the right at any time by contacting us at [hello@muvelive.com].

You have the right to exclude yourself from profiling and other automated decision-making by contacting us at [hello@muvelive.com].

You can correct factual errors in your personal information that we hold by sending us a request that credibly shows that there is an error in our records. To protect your privacy and security, we will also take reasonable steps to verify your identity before granting access or making corrections.

### **Access to your information**

Data protection law gives you the right to confirmation that we are processing your personal data and to access information held about you, subject to some exceptions. Your right of access can be exercised by contacting us at [hello@muvelive.com]. Any access requests are usually free of charge,



however we reserve the right to charge a fee where we are entitled to do so by data protection law.

### **Changes to our privacy policy**

Any changes we make to our privacy policy in the future will be posted on this page and, where appropriate, notified to you by email. Please check back frequently to see any updates or changes to our privacy policy.

### **Contact**

Questions, comments and requests regarding this privacy policy are welcomed and should be addressed to [hello@muvelive.com].

### **Version number and date**

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