

OUR PRIVACY POLICY

Flair Life Limited trading as Flair.life, Flairlife, Flair Yoga (“we”, “us”, or “our”) are committed to protecting and respecting the personal data that we hold. This privacy statement describes why and how we collect and use personal data and provides information about individuals’ rights. It applies to personal data provided to us, both by individuals themselves or by others on behalf of individuals. We may use personal data provided to us for the purposes described in this privacy statement or as made clear in another form before collecting personal data

Flair Life has a responsibility to keep all of your personal information safe. This page explains how we handle your personal information. This information was updated on 10 February 2022

Personal data is any information relating to an identified or identifiable living person. When collecting and using personal data, our policy is to be transparent about why and how we process personal data.

We process personal data for numerous purposes, and the means of collection, lawful basis of processing, use, disclosure, and retention periods for each purpose differ, and are set out in the relevant sections below.

The personal data that is provided to us is provided either directly from the individual concerned, from a third party acting on behalf of an individual, or from publicly available sources (such as internet searches, and Companies House).

We take great care with your personal information. Sometimes the law means we will have to share your personal information. But this is always to protect you or children. If you would like someone to explain these laws to you, please email dataprocessing@flair.life

Where we receive personal data from a third party that relates to an individual, we request that this third party inform the individual of the necessary information regarding the use of their data. Where necessary, reference may be made to this privacy statement.

What is personal information?

Personal information is anything that can identify you in some way. It can include lots of things, like your name, your address, your date of birth and even a photo of you. It also includes your health, your sexuality and your computer's IP address, and includes things you've told us about yourself like what you've done and how you're feeling.

If you use Flair Life, we may collect the following information about you:

- basic contact details, including your name, email address, postal address, telephone or mobile number and date of birth
- IP address
- photos, videos or audio recordings where necessary.

Some of your personal information is more important, or special, because it is very personal. We will only collect this special information if we have an important reason and we will look after it as carefully as possible. We may collect the following special information:

- health information, such as illnesses you may have or medicines that you might take
- your sexuality
- your ethnicity, religion or cultural background.

What do we use your personal information for?

We use your information to help us support you in the best way we can. We will use it for things like:

- Keeping notes of our conversations in one-to-one chats, over the phone, messages to us or things that are posted on the message boards.
- Referring to these notes when you contact us again to make sure we can give you the best help.
- Looking at the quality of the conversations with you for training our staff.
- Understanding the types of things affecting client or young people to help us improve our service.
- Sharing your information with other people if you ask us to or we need to

Our reason for using your information

When we use any of your personal information, we need to have a reason for using it. This means that we may use your personal information to make sure we support you in the best way we can. If we use your information to look at the types of things clients or young people talk to us about, this will be anonymous so your identity will be kept hidden.

Sharing your information with other people

Whenever you contact Flair Life it's confidential. This means that we will not tell anyone outside of Flair Life.

Security

We take the security of all the data we hold seriously. Staff are trained on data protection, confidentiality and security, and we maintain a culture of confidentiality.

We have a framework of policies and procedures which ensure that we keep the data we hold secure.

All information you provide to us is stored on our locally hosted secure servers. Where we have given you (or where you have chosen) a password which enables you to access certain parts of our site, you are responsible for keeping this password confidential. We ask that you do not share your 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 site; 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.

Data that we hold

We provide services to individuals as well as businesses, non-profits, and other organisations. The exact data held will depend on the services to be provided.

Where we engage with clients for professional services, we may collect and process personal data in order to satisfy a contractual obligation. We request that clients only provide the personal data that is required for us to fulfil our contractual obligation.

Where we are legally permitted to do so, we shall notify our clients if we receive a request for a data subject to exercise their rights under GDPR, or if we are served with information from a supervisory authority.

Why do we process data?

Where data is collected for professional services, it is used for a number of purposes, such as;

- Providing services to clients. Data is processed in order to provide a service detailed in our offer or quotation between you and us, and may sometimes be further clarified in other written documentation supplied before any data processing may occur;
- Client management. When communicating with and assessing the needs of clients, personal data may be processed in order to ensure that their needs are appropriately satisfied. This may include assessing whether the right service is being provided to our clients.
- Administration. In order to manage and administer our business and services, we may collect and process personal data. This may include (but is not limited to) maintaining internal business records, managing client relationships, hosting events, administering client facing applications, and maintaining internal operating processes.
- Regulatory. In order to undertake professional services, we may from time to time be required to collect and process personal data in order to fulfil regulatory, legal or ethical requirements. This may include the verification of identity of individuals.

What data is processed?

The data that is processed is dependent on the service that is being provided and on the recipient of this service.

- Services to businesses, non-profits, and other organisations. We process the personal data of individuals associated with our clients. Personal data may include any relevant financial or non-financial information necessary for us to provide our services. As an example, this may include contact details, payroll data, employee information (including details about dismissal), lists of shareholders, customers and suppliers and any other specifically relevant data.
- Services to individuals. Personal data may include contact details and tax identifiers, information about business activities, investments, and other financial interests, payroll and other income, and any other specifically relevant data.

How long do we hold data for?

We retain the personal data processed by us in a live environment for as long as is considered necessary for the purpose(s) for which it was collected (including as required by applicable law or regulation, typically 2 years). We may keep data for longer in order to establish, exercise, or defend our legal rights and the legal rights of our clients.

In addition, personal data may be securely archived with restricted access and other appropriate safeguards where there is a need to continue to retain it.

Keeping your records and information

We will look after your information carefully, to make sure that nobody can see it unless they have a genuine reason to see it. We store your information in this country, the UK. None of your information is stored in another country, but if we ever needed to store your information in another country, we

would update this privacy policy to let you know and continue to look after your information carefully and make sure we store it legally.

We will do our very best to keep your information safe and secure. We'll usually keep a record of your Flair Life contact for two years.

Surveys, message boards and the image gallery

Sometimes we will ask you to fill in questionnaires or surveys online to help us improve our service and the website. Our surveys are normally anonymous, which means that your identity will be kept hidden.

Links to other websites

The Flair.life website includes links to other sites that Flair Life doesn't own or manage. We do our best to make sure these links are trustworthy but we can't control how the sites collect information or what they do with it.

Because of that we can't be held responsible for these websites. If you're not sure what data a site collects you can read its privacy policy. If you click on a link and go to another website, please be careful because we do not control what they do with your information.

People who use our website

When you visit our website, personal data is collected both through automated tracking and interactions with various forms on the website

Personal data may also be collected when individuals correspond with us by phone, e-mail or otherwise. This includes information provided when an individual registers to use our websites, subscribes to our services, makes an enquiry, comments on publications, enters a competition, promotion or survey, applies to work for Flair Life Limited or reports a problem with our websites.

When individuals visit our website or portal, certain personal data may be automatically collected. We work closely with third parties who may collect data on our behalf (including, for example, business partners, sub-contractors in technical, payment and delivery services, advertising networks, analytics providers, search information providers, credit reference agencies).

Often, individuals who visit our website additionally fall into another category as listed by this privacy statement. For instance, users of our websites may be current clients, business contacts or become clients in the future. Where this is the case, data held and processed for individuals who use our website may also become data that is held and processed for another purpose.

Why do we process data?

There are a number of reasons why we will process the personal data that an individual may provide to us when visiting our websites. As examples, these include;

- **Administration.** In order to administer our site and to improve internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes. For example, we use this data to ensure that the website is presented well for individuals and is optimised appropriately.
- **Functionality.** In order to allow individuals to use some functionality of our website, certain personal data must be entered in order for features to work as intended.

- Security. In order to keep our site safe and secure, we may sometimes collect personal data, for instance login information and other data that can be used to vouch an individual's identity.
- Promotion and development of our offerings. Some personal data may be used in order to measure or understand the effectiveness of advertising we serve to individuals, and to ensure that only relevant advertising appears.

What data do we hold?

The data that we hold depends on what data was entered and for what purpose.

Where data was entered in order to engage with functionality of our website, that personal data may include their name, address, e-mail address and phone number, financial and credit card information, personal description and photograph.

Where data is collected automatically, the data that we may collect includes technical information, including the Internet protocol (IP) address used to connect an individual's computer to the internet, login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform;

Other data about an individual's visit, including the full Uniform Resource Locators (URL) clickstream to, through and from our site (including date and time); products 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), and methods used to browse away from the page and any phone number used to call our customer service number.

Our website uses cookies to distinguish individuals from one another. This helps us to provide a better experience when individuals browse our website and also allows us to improve our site. For detailed information on the cookies, we use and the purposes for which we use them see our Cookie policy.

How long do we hold data for?

We retain the personal data processed by us in a live environment for as long as is considered necessary for the purpose(s) for which it was collected (including as required by applicable law or regulation, typically 2 years).

In addition, personal data may be securely archived with restricted access and other appropriate safeguards where there is a need to continue to retain it.

How do we use cookies?

Cookies are small files stored on your computer or mobile device web browser. Our site uses these cookies to keep you logged in as you move around the site, to provide some of our content, and to monitor the websites' performance. This helps us make the website better for you and for others.

Some of this information is shared with other companies, you can find out more about how we use cookies and the types of cookies that we use on our cookies page. This page also provides information on how you can prevent or control the cookies that are stored on your computer or device web browser, as well as remove them completely.

SHARING PERSONAL DATA

We will only share personal data with others when we are legally permitted to do so. When we share data with others, we put contractual arrangements and security mechanisms in place to protect the data and to comply with our data protection, confidentiality and security standards.

Personal data held by us may be transferred to:

- Third party organisations that provide applications/functionality, data processing or IT services to us. We use third parties to support us in providing our services and to help provide, run and manage our internal IT systems. For example, providers of information technology, cloud-based software as a service provider, identity management, website hosting and management, data analysis, data back-up, security and storage services.
- Third party organisations that otherwise assist us in providing goods, services or information.
- Auditors and other professional advisers.
- Law enforcement or regulatory agencies or those required by law or regulations.

Occasionally, we may receive requests from third parties with authority to obtain disclosure of personal data, such as to check that we are complying with applicable law and regulation, to investigate an alleged crime or to establish, exercise or defend legal rights. We will only fulfil requests for personal data where we are permitted to do so in accordance with applicable law or regulation.

INDIVIDUAL'S RIGHTS

Individuals have certain rights over their personal data and data controllers are responsible for fulfilling these rights as follows:

- Individuals may request access to their personal data held by us as a data controller.
- Individuals may request us to rectify personal data submitted to us or, where appropriate, contact us via the relevant website registration page or by amending the personal details held on relevant applications with which they registered.
- Individuals may request that we erase their personal data
- Where we process personal data based on consent, individuals may withdraw their consent at any time by contacting us or clicking on the unsubscribe link in an email received from us.
- Individuals may have other rights to restrict or object to our processing of personal data and the right to data portability.
- Individuals may request information about, or for human intervention into, any automated data processing that we may undertake.

If you wish to exercise any of these rights, please contact us dataprocessing@flair.life

Asking for a copy of your records

If you've ever contacted Flair Life, you can ask for a copy of any personal information we have about you. This is called a 'Subject Access Request'.

Contacting Flair Life is confidential. This means we can only give out records and personal details if you give us information that helps us find the right notes, like your username or the answer to your secret question.

It's also important to think about whether asking to see your records is the right decision for you. And to get further support. If you do decide to read your notes. No-one is allowed to make you ask for a copy of your information. It must be your choice. Reading over a conversation you had with us in the past could be upsetting and might bring up things you'd rather forget.

Sometimes we will need to talk to you about ways that you can confirm who you are.

You also have the right to:

- Ask us to change information you think is wrong, for example if you need to update your email address.
- Ask us to delete any of your personal information we have if we don't have a reason to keep it. If we need to keep some information about you, we will explain why.
- Ask us to move your information to you or to another organisation in an easy-to-read format. This might be if we had collected your information because you gave us your consent or it was part of a contract, and because we collected it in an automated way, for example using a messaging service.
- Ask us to stop using your information, or ask us to only use it in a certain way.

COMPLAINTS

We hope that you won't ever need to, but if you do want to complain about our use of personal data, please send an email with the details of your complaint to dataprocessing@flair.life

We will look into and respond to any complaints we receive. You also have the right to lodge a complaint with the UK data protection regulator, the Information Commissioner's Office ("ICO"). For further information on your rights and how to complain to the ICO, please refer to the ICO website <https://ico.org.uk/concerns>

Data Controller & Contact Information

The Data Controller for Flair Life registered in England & Wales under registration No. 13845764 and with its registration address at 152 Camden Street, London NW1 9PA

If you have any questions about this privacy statement or how and why we process personal data, please contact us at:

Data Controller

Flair Life
152 Camden Street
London NW1 9PA

Email: dataprocessing@flair.life

How to contact us

If you have any questions about how we use your personal data, you can email our team at dataprocessing@flair.life

The Information Commissioner's Office (ICO) regulates Data Protection in the UK. You have a right to contact them directly via their website www.ico.org.uk or 0303 123 1113.