



## Rewind Life Limited

# Privacy and Data Protection

### 1. General

- 1.1** Rewind Life Limited (“Rewind” “we” or “us”) takes the privacy of your information very seriously. Our Privacy and Data Protection Policy is designed to tell you, the user of our mobile applications, website or other digital products (together referred to as the “Service”) about our practices regarding the collection, use and disclosure of personal and other information about you, your enterprise or your organisation that may be provided via our website (the “Site”), its associated mobile applications (the “Apps”) and any other digital product provided by Rewind or collected through other means such as an online form, email, or telephone communication.
- 1.2** This notice applies to personal data provided by our users, whether they are a user of our Service or otherwise. In this notice “you” refers to any individual whose personal data we hold or process (other than our staff).
- 1.3** In this notice, references to the “Site” are references to any website, app or other means by which you provide personal data to us or access our services.
- 1.4** This notice is governed by the European Union Regulation (EU) 2016/679 (General Data Protection Regulation) as such regulation is adopted into the law of the United Kingdom pursuant to the European Union (Withdrawal Act) 2018 and as amended by the Data Protection Act 2018 and any successor regulation or law (the “UK GDPR”).

### 2. Basis on which We process personal data

- 2.1** Personal data we hold about you will be processed either because:
- 2.1.1** the processing is necessary in pursuit of a “legitimate interest”, a legitimate interest in this context means a valid interest we have or a third party has in processing your personal data which is not overridden by your interests in data privacy and security;
- 2.1.2** you have consented to the processing for the specific purposes described in this notice;
- 2.1.3** the processing is necessary in order for us to comply with our obligations under a contract between you and us.

### 3. Personal data We collect

- 3.1** We may collect and process the following personal data (information that can be uniquely identified with you) about you:
- 3.1.1** log-in details and information you provide when setting up an account on the Site such as an email address and your name (“Login Information”);
- 3.1.2** information you provide to us relating to your account or profile with us such as notes, references, details of contacts and date of birth (“Profile Information”);

- 3.1.3** contact information we collect from you (for example, your name, address, telephone number, email address, country of residence) (“Contact Information”);
  - 3.1.4** information we collect which relates to your interaction with the Service such as posts, messages, links and comments (“Service Information”);
  - 3.1.5** information provided relating to payment (“Payment Information”), but please note that credit or debit card information may be supplied directly to a third party payment processor who will process the data in accordance with their own privacy notices or policies (see below);
  - 3.1.6** a record and details of any correspondence or communication between you and us or relating to any complaint submitted to us (“Communication Information”);
  - 3.1.7** details of your visits to the Site, the resources and pages that you access and any searches you make (“Technical Information”).
- 3.2** We will not collect any sensitive personal data without your prior consent. By sensitive personal data we mean data which falls within certain ‘special categories’ which are defined in the UK GDPR (e.g. health data) and which require additional protection and consent measures.
- 3.3** You do not have to supply any personal information to us but some of the Site functionality may not be operable without providing data to us.
- 3.4** You may withdraw our authority to process your personal data (or request that we restrict our processing – see clause 10) at any time but we may need to withhold some personal data for legal or other reasons (see below).
- 4. Cookies and IP Address**
- 4.1** A cookie is a piece of data stored locally on your computer and contains information about your activities on the Internet. The information in a cookie does not contain any personally identifiable information you submit to our Site.
- 4.2** On our Site, we use cookies to track users' progress, allowing us to make improvements based on usage data. We also use cookies if you log in to one of our online services to enable you to remain logged in to that service. A cookie helps you get the best out of the Site and helps us to provide you with a more customised service.
- 4.3** Once you close your browser, our access to the cookie terminates. You have the ability to accept or decline cookies. Most web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. To change your browser settings you should go to your advanced preferences.
- 4.4** We are required to obtain the consent of users from the EEA (European Economic Area) to use cookies. EEA users will obtain this consent with a toolbar which appears when they first visit the Site.
- 4.5** If you choose not to accept the cookies, this will not affect your access to the majority of information available on our Site. However, you will not be able to make full use of our online services.
- 4.6** An Internet Protocol (IP) address is a number assigned to your computer by your Internet Service Provider (ISP), so you can access the Internet. We may use your IP address to diagnose problems with our server, report aggregate information, and determine the fastest route for your computer to use in connecting to our Site, and to administer and improve the Site.

## 5. How We process your personal data

5.1 Please see the table below, which sets out the manner in which we will process the different types of personal data we hold:

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
When you register with the Site	Login Information	Performance of a contract with you  Necessary for our legitimate interests (to obtain necessary information in order to provide our Service)
When you update or amend your profile information	Login Information Profile Information	Performance of a contract with you
When you interact with the Service and other users	Login Information Profile Information Service Information Payment Information	Performance of a contract with you  Necessary for our legitimate interests (for running our business and to provide you with the Service)
To manage our relationship with you which will include:  (a) Notifying you about changes to our terms or privacy notice  (b) Asking you to leave a review or take a survey  (c) When you submit a complaint	Login Information Profile Information Service Information  Communication Information Technical Information	Performance of a contract with you  Necessary to comply with a legal obligation  Necessary for our legitimate interests (to keep our records updated and to study how users use the Service)
To administer and protect our business, including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data	Login Information Service Information Contact Information Technical Information	Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation)  Necessary to comply with a legal obligation
To use data analytics to improve the Site, services, marketing, user relationships and experiences	Technical Information Communication Information	Necessary for our legitimate interests (to define types of users for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)

## 6. Data Retention

6.1 Our current data retention policy is to delete or destroy (to the extent we are able to) the personal data we hold about you in accordance with the following:

Category of personal data	Length of retention
Records relevant for tax purposes	8 years from the end of the tax year to which the records relate
Personal data processed in relation to a contract between you and us	7 years from either the end of the contract or the date you last used our services or placed an order with us, being the length of time following a breach of contract in which a contract party is entitled to make a legal claim
Personal data held on marketing or business development records	3 years from the last date on which you have interacted with us

6.2 For any category of personal data not specifically defined in this notice, and unless otherwise specified by applicable law, the required retention period for any personal data will be deemed to be 7 years from the date of receipt by us of that data or (if later) the end of the relevant contract, arrangement or interaction with that person.

6.3 The retention periods stated in this notice can be prolonged or shortened as may be required (for example, in the event that legal proceedings apply to the data or if there is an on-going investigation into the data).

6.4 We review the personal data (and the categories of personal data) we are holding on a regular basis to ensure the data we are holding is still relevant to our business and is accurate. If we discover that certain data we are holding is no longer necessary or accurate, we will take reasonable steps to correct or delete this data as may be required.

6.5 If you wish to request that data we hold about you is amended or deleted, please see clause 10 below, which explains your privacy rights.

## 7. Sharing your information

7.1 Any content posted on or appearing on the Site or any other digital product provided by Rewind will only be shared with users selected by you and third parties of the Site, the Apps or any other digital product provided by Rewind with your consent.

7.2 If we require payment for any aspect of the Service, credit and debit card information will be provided to our payment processing partner. This information will be supplied to our payment processing partner directly, even if you provide the information while on our Site. Our payment processing partner will be the data controller for credit and debit card information.

7.3 Our payment processing partner will have their own privacy policies and notices. But we will take steps to ensure that they are compliant with applicable data protection legislation and we will consult with them in relation to maintaining the security of payment information.

7.4 We do not disclose any personal data you provide to any third parties other than as follows:

7.4.1 we may host personal data with third party hosting partners;

- 7.4.2** certain third party suppliers including technical support providers may have access to personal data;
- 7.4.3** where we carry out research to gain an insight into the use of our Service, the results of this research (but not your personal data itself) may be transferred to interested third parties;
- 7.4.4** if we are under a duty to disclose or share your personal data in order to comply with any legal obligation (for example, if required to do so by a court order or for the purposes of prevention of fraud or other crime);
- 7.4.5** in order to enforce any terms and conditions or agreements for our services that may apply;
- 7.4.6** we may transfer your personal information to a third party as part of a sale of some or all of our business and assets to any third party or as part of any business restructuring or reorganisation, but we will take steps with the aim of ensuring that your privacy rights continue to be protected;
- 7.4.7** to protect our rights, property and safety, or the rights, property and safety of our users or any other third parties. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

**7.5** Other than as set out above, we shall not disclose any of your personal information unless you give us permission to do so. If we do supply your personal information to a third party we will take steps to ensure that your privacy rights are protected and that third party complies with the terms of this notice.

## **8. Email and Other Communications**

- 8.1** If you have placed an order for goods and services with us we may from time to time contact you about similar goods or services.
- 8.2** When we send email or other electronic communications we will comply with applicable regulations including the Privacy and Electronic Communications Regulations 2003. In particular we will identify the nature of the message and the sender clearly and you will have an opportunity to opt out of receiving any further communications from us.

## **9. Security**

- 9.1** We will take all reasonable steps to ensure that appropriate technical and organisational measures are carried out in order to safeguard the information we collect from you and protect against unlawful access and accidental loss or damage. These measures may include (as necessary):
  - 9.1.1** protecting our servers by both hardware and software firewalls;
  - 9.1.2** locating our data processing storage facilities in secure locations;
  - 9.1.3** encrypting all data stored on our server with an industry standard encryption method that encrypts the data between your computer and our server so that in the event of your network being insecure no data is passed in a format that could easily be deciphered;
  - 9.1.4** when necessary, disposing of or deleting your data so it is done so securely;
  - 9.1.5** regularly backing up and encrypting all data we hold.

**9.2** We will ensure that our employees are aware of their privacy and data security obligations. We will take reasonable steps to ensure that the employees of third parties working on our behalf are aware of their privacy and data security obligations.

**9.3** This notice and our procedures for handling personal data will be reviewed as necessary.

**9.4** 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 and stored on the Site. Once we have received your information, we will use the procedures and security features referred to in this notice to try to prevent unauthorised access.

## **10. Your Privacy Rights**

**10.1** The UK GDPR gives you the following rights in respect of personal data we hold about you:

<b>The right to be informed</b>	You have a right to know about our personal data protection and data processing activities, details of which are contained in this notice.
<b>The right of access</b>	You can make what is known as a Subject Access Request ("SAR") to request information about the personal data we hold about you (free of charge, save for reasonable expenses for repeat requests). If you wish to make a SAR please contact us as described below.
<b>The right to correction</b>	Please inform us if information we hold about you is incomplete or inaccurate in any way and we will update our records as soon as possible, but in any event within one month.  We will take reasonable steps to communicate the change to any third parties to whom we have passed the same information.
<b>The right to erasure (the 'right to be forgotten')</b>	Please notify us if you no longer wish us to hold personal data about you (although in practice it is not possible to provide our services without holding your personal data). Unless we have reasonable grounds to refuse the erasure, on receipt of such a request we will securely delete the personal data in question within one month. The data may continue to exist in certain backup, but we will take steps to ensure that it will not be accessible.  We will communicate the erasure to any third parties to whom we have passed the same information.
<b>The right to restrict processing</b>	You can request that we no longer process your personal data in certain ways, whilst not requiring us to delete the same data.
<b>The right to data portability</b>	You have the right to receive copies of personal data we hold about you in a commonly used and easily storable format (please let us know a format which suits you). You may also request that we transfer your personal data directly to a third party (where technically possible).
<b>The right to object</b>	Unless we have overriding legitimate grounds for such processing, you may object to us using your personal data

	if you feel your fundamental rights and freedoms are impacted. You may also object if we use your personal data for direct marketing purposes (including profiling) or for research or statistical purposes. Please notify your objection to us and we will gladly cease such processing, unless we have overriding legitimate grounds.
<b>Rights with respect to automated decision-making and profiling</b>	You have a right not to be subject to automated decision-making (including profiling) when those decisions have a legal (or similarly significant effect) on you. You are not entitled to this right when the automated processing is necessary for us to perform our obligations under a contract with you, it is permitted by law, or if you have given your explicit consent.
<b>Right to withdraw consent</b>	If we are relying on your consent as the basis on which we are processing your personal data, you have the right to withdraw your consent at any time. Even if you have not expressly given your consent to our processing, you also have the right to object (see above).

**10.2** All SARs and other requests or notifications in respect of your above rights must be sent to us in writing to Rewind Life Limited at [jon@rewind-remind.me](mailto:jon@rewind-remind.me).

**10.3** We will endeavour to comply with such requests as soon as possible but in any event we will comply within one month of receipt (unless a longer period of time to respond is reasonable by virtue of the complexity or number of your requests).

## **11. Data Breaches**

**11.1** If personal data we hold about you is subject to a breach or unauthorised disclosure or access, we will report this to the Information Commissioner's Office (ICO).

**11.2** If a breach is likely to result in a risk to your data rights and freedoms, we will notify you as soon as possible.

## **12. Other Websites**

**12.1** Our Site may contain links and references to other websites. Please be aware that this notice does not apply to those websites.

**12.2** We cannot be responsible for the privacy policies and practices of sites that are not operated by us, even if you access them via the Site. We recommend that you check the policy of each site you visit and contact its owner or operator if you have any concerns or questions.

**12.3** In addition, if you came to this Site via a third party site, we cannot be responsible for the privacy policies and practices of the owners or operators of that third party site and recommend that you check the policy of that third party site and contact its owner or operator if you have any concerns or questions.

## **13. Transferring your information outside of Europe**

**13.1** As part of the services provided to you the information you provide to us may be transferred to, processed and stored at, countries or international organisations outside of the UK and EEA ("European Area").

**13.2** We have users who are outside of the European Area and in those circumstances personal data will be transferred outside of the European Area.

**13.3** We will not transfer the personal data of European Area users in a systematic way outside of the European Area but there may be circumstances in which certain personal information is transferred outside of the European Area, in particular:

**13.3.1** If you use our Site while you are outside the European Area, your information may be transferred outside the European Area in order to provide you with our services;

**13.3.2** We may communicate with individuals or organisations outside of the European Area in providing services, those communications may include personal information (such as contact information) for example you may be outside of the European Area when we communicate with you;

**13.3.3** From time to time your information may be stored in devices which are used by our staff outside of the European Area (but staff will be subject to our cyber-security policies).

**13.4** If we transfer your information outside of the European Area, and the third country or international organisation in question has not been deemed by the EU Commission to have adequate data protection laws, we will provide appropriate safeguards and we will be responsible for ensuring your privacy rights continue to be protected as outlined in this notice. If you would like to obtain details of the safeguards we have put in place then please contact us at: to Rewind Life Limited at [jon@rewind-remind.me](mailto:jon@rewind-remind.me)

**13.5** By submitting your personal information to us you agree to the transfer, storing or processing of your information outside the European Area in the manner described above.

#### **14. Notification of changes to the contents of this notice**

We will post details of any changes to our policy on the Site to help ensure you are always aware of the information we collect, how we use it, and in what circumstances, if any, we share it with other parties.

#### **15. Contact Us**

If at any time you would like to contact us with your views about our privacy practices, or with any enquiry or complaint relating to your personal information or how it is handled, please contact us at [jon@rewind-remind.me](mailto:jon@rewind-remind.me)

If we are unable to resolve any issues you may have or you would like to make a further complaint, you can contact the Information Commissioner's Office by visiting <http://www.ico.org.uk> for further assistance.

