

# Privacy Policy

## BACKGROUND

Catalyst Wellbeing Limited understands that your privacy is important to you and that you care about how your personal data is used. We respect and value the privacy of everyone who visits our website [www.catalystwellbeing.com](http://www.catalystwellbeing.com) and will only collect and use personal data in ways that are described here, and in a way that is consistent with our obligations and your rights under the law.

Please read this Privacy Policy carefully and ensure that you understand it. Your acceptance of this Privacy Policy is requested during usage of our website.

## 1. Definitions and Interpretation

In this Policy the following terms shall have the following meanings:

“Account”	means an account required to access and/or use certain areas and features of our Assets;
“Cookie”	means a small text file placed on your computer or device by Our Sites when you visit certain parts of Our Assets and/or when you use certain features of Our Assets. Details of the Cookies used by Our Assets are set out in Part 14, below; and
“Cookie Law”	means the relevant parts of the Privacy and Electronic Communications (EC Directive) Regulations 2003;

## 2. Information About Us

Our Assets are owned and operated by Catalyst Wellbeing Limited, a limited company registered in England under company number 11219512.

Registered address: 55 Penyston Road, Maidenhead, Berkshire, SL6 6EJ.

Data Protection Officer: Simon Worth Email address: [info@catalystwellbeing.com](mailto:info@catalystwellbeing.com).

## 3. What Does This Policy Cover?

This Privacy Policy applies only to your use of Our Assets. Our Assets may contain links to other websites. Please note that we have no control over how your data is collected, stored, or used by other websites or mobile phone applications and we advise you to check the privacy policies of any such websites or applications before providing any data to them.

## 4. What Is Personal Data?

Personal data is defined by the General Data Protection Regulation (EU Regulation 2016/679) (the “GDPR”) and the Data Protection Act 2018 (collectively, “the Data Protection Legislation”) as ‘any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier’.

Personal data is, in simpler terms, any information about you that enables you to be identified. Personal data covers obvious information such as your name and contact details, but it also covers less obvious information such as identification numbers, electronic location data, and other online identifiers.

## 5. What Are My Rights?

Under the Data Protection Legislation, you have the following rights, which we will always work to uphold:

1. The right to be informed about our collection and use of your personal data. This Privacy Policy should tell you everything you need to know, but you can always contact us to find out more or to ask any questions using the details in Part 15.
2. The right to access the personal data we hold about you. Part 13 will tell you how to do this.
3. The right to have your personal data rectified if any of your personal data held by us is inaccurate or incomplete. Please contact us using the details in Part 15 to find out more.
4. The right to be forgotten, i.e. the right to ask us to delete or otherwise dispose of any of your personal data that we hold. Please contact us using the details in Part 15 to find out more.
5. The right to restrict (i.e. prevent) the processing of your personal data.
6. The right to object to us using your personal data for a particular purpose or purposes.
7. The right to withdraw consent. This means that, if we are relying on your consent as the legal basis for using your personal data, you are free to withdraw that consent at any time.
8. The right to data portability. This means that, if you have provided personal data to us directly, we are using it with your consent or for the performance of a contract, and that data is processed using automated means, you can ask us for a copy of that personal data to re-use with another service or business in many cases.
9. Rights relating to automated decision-making and profiling.

For more information about our use of your personal data or exercising your rights as outlined above, please contact us using the details provided in Part 15.

It is important that your personal data is kept accurate and up-to-date. If any of the personal data we hold about you changes, please keep us informed as long as we have that data.

Further information about your rights can also be obtained from the Information Commissioner's Office or your local Citizens Advice Bureau.

If you have any cause for complaint about our use of your personal data, you have the right to lodge a complaint with the Information Commissioner's Office.

We would welcome the opportunity to resolve your concerns ourselves, however, so please contact us first, using the details in Part 15.

## 6. What Data Do You Collect and How?

Depending upon your use of Our Assets, we may collect and hold some or all of the personal and non-personal data set out in the table below, using the methods also set out in the table. Please also see Part 14 for more information about our use of Cookies and similar technologies.

<b>Data Collected</b>	<b>How We Collect the Data</b>
Identity Information including name, date of birth, gender, residential country, residential city, password.	Collected at the time of user registration.
Contact information being your email address.	Collected at time of user registration
Profile information including preferences, survey results, time watching videos, number of articles read, comments left	Collected via Our Assets, in particular when the user completes the 7 question survey, or interacts with Our Assets for example, by reading an article, or watching a video.
Purchase information including the date and time of each purchase, the cost, date and time of appointment purchased	Collected at point of sale within our Assets

## 7. How Do You Use My Personal Data?

Under the Data Protection Legislation, we must always have a lawful basis for using personal data. The following table describes how we will or may use your personal data, and our lawful bases for doing so:

<b>What We Do</b>	<b>What Data We Use</b>	<b>Our Lawful Basis</b>
Registering you on Our Assets	Identity Information Contact Information	Our Assets require user registration to gain access to all the provided content
Providing and managing your Account	Identity Information Contact Information Profile Information	We provide users with the ability to manage their account
Providing and managing your access to Our Assets	Identity Information Contact Information	Our assets are secured
Personalising and tailoring your experience on Our Assets	Identity Information Contact Information Profile Information	Our assets will suggest content based on user inputs
Communicating with you	Contact Information	Our assets will generate emails to notify you of changes (eh to content, policies, functions, and features), forthcoming events and news and also a periodic newsletter

With your permission and/or where permitted by law, we may also use your personal data for marketing purposes, which may include contacting you by email and mobile based notifications with information, news, and offers on our products and services. You will not be sent any unlawful marketing or spam. We will always work to fully protect your rights and comply with our obligations under the Data Protection Legislation and the Privacy and Electronic Communications (EC Directive) Regulations 2003, and you will always have the opportunity to opt-out.

We will only use your personal data for the purpose(s) for which it was originally collected unless we reasonably believe that another purpose is compatible with that or those original

purpose(s) and need to use your personal data for that purpose. If we do use your personal data in this way and you wish us to explain how the new purpose is compatible with the original, please contact us using the details in Part 15.

If we need to use your personal data for a purpose that is unrelated to, or incompatible with, the purpose(s) for which it was originally collected, we will inform you and explain the legal basis which allows us to do so.

In some circumstances, where permitted or required by law, we may process your personal data without your knowledge or consent. This will only be done within the bounds of the Data Protection Legislation and your legal rights

## 8. How Long Will You Keep My Personal Data?

We will not keep your personal data for any longer than is necessary in light of the reason(s) for which it was first collected. Your personal data will therefore be kept for the following periods (or, where there is no fixed period, the following factors will be used to determine how long it is kept):

### Type of Data

Identity Information including name, date of birth, gender, residential country, residential city, password.	1 year after the date a user stops using Our Assets
Contact information being your email address.	1 year after the date a user stops using Our Assets
Profile information including preferences, survey results, time watching videos, number of articles read, comments left	1 year after the date a user stops using Our Assets
Purchase information including the date and time of each purchase, the cost, date and time of appointment purchased	1 year after the date a user stops using Our Assets
Identity Information including name, date of birth, gender, residential country, residential city, password	1 year after the date a user stops using Our Assets

## 9. How and Where Do You Store or Transfer My Personal Data?

We will only store or transfer your personal data within the European Economic Area (the “EEA”). The EEA consists of all EU member states, plus Norway, Iceland, and Liechtenstein. This means that your personal data will be fully protected under the Data Protection Legislation, GDPR, and/or to equivalent standards by law.

## 10. Do You Share My Personal Data?

We will not share any of your personal data with any third parties for any purposes, subject to the following exceptions.

If we sell, transfer, or merge parts of our business or assets, your personal data may be transferred to a third party. Any new owner of our business may continue to use your personal data in the same way(s) that we have used it, as specified in this Privacy Policy.

In some limited circumstances, we may be legally required to share certain personal data, which might include yours, if we are involved in legal proceedings or complying with legal obligations, a court order, or the instructions of a government authority.

## 11. How Can I Control My Personal Data?

In addition to your rights under the Data Protection Legislation, set out in Part 5, when you submit personal data via Our Assets, you may be given options to restrict our use of your personal data. In particular, we aim to give you strong controls on our use of your data for direct marketing purposes (including the ability to opt-out of receiving emails from us which you may do by unsubscribing using the links provided in our emails and by managing your Account). You may also wish to sign up to one or more of the preference services operating in the UK: The Telephone Preference Service (“the TPS”), the Corporate Telephone Preference Service (“the CTPS”), and the Mailing Preference Service (“the MPS”). These may help to prevent you from receiving unsolicited marketing. Please note, however, that these services will not prevent you from receiving marketing communications that you have consented to receiving.

## 12. Can I Withhold Information?

You may access certain areas of Our Assets without providing any personal data at all. However, to use all features and functions available on Our Assets you may be required to submit or allow for the collection of certain data.

## 13. How Can I Access My Personal Data?

If you want to know what personal data we have about you, you can ask us for details of that personal data and for a copy of it (where any such personal data is held). This is known as a “subject access request”.



All subject access requests should be made in writing and sent to the email address in Part 15. To make this as easy as possible for you, a Subject Access Request Form is available for you to use. You do not have to use this form, but it is the easiest way to tell us everything we need to know to respond to your request as quickly as possible.

There is not normally any charge for a subject access request. If your request is 'manifestly unfounded or excessive' (for example, if you make repetitive requests) a fee may be charged to cover our administrative costs in responding.

We will respond to your subject access request within 30 calendar days and, in any case. Normally, we aim to provide a complete response, including a copy of your personal data within that time. In some cases, however, particularly if your request is more complex, more time may be required up to a maximum of three months from the date we receive your request. You will be kept fully informed of our progress.

## 14. How Do You Use Cookies?

Our Assets may place and access certain first-party Cookies on your computer or device. First-party Cookies are those placed directly by us and are used only by us. We use Cookies to facilitate and improve your experience of Our Assets and to provide and improve our products and services. We have carefully chosen these Cookies and have taken steps to ensure that your privacy and personal data is protected and respected at all times.

All Cookies used by and on Our Assets are used in accordance with current Cookie Law.

## 15. How Do I Contact You?

To contact us about anything to do with your personal data and data protection, including to make a subject access request, please use the following details (for the attention of Laura Rogers):

Email address: [info@catalystwellbeing.com](mailto:info@catalystwellbeing.com).

## 16. Changes to this Privacy Policy

We may change this Privacy Notice from time to time. This may be necessary, for example, if the law changes, or if we change our business in a way that affects personal data protection.

Any changes will be immediately posted on Our Assets and you will be deemed to have accepted the terms of the Privacy Policy on your first use of Our Assets following the alterations. We recommend that you check this page regularly to keep up-to-date. This Privacy Policy was last updated on 4th February 2020.