

Privacy Policy

We take your privacy very seriously. Please read this privacy policy carefully as it contains important information on who we are, how and why we collect, store, use, and share your personal information. It also explains your rights in relation to your personal information and how to contact us or supervisory authorities in the event you have a complaint.

We collect, use and are responsible for certain personal information about you. If you are in the European Union (including in the United Kingdom) then we are subject to the General Data Protection Regulation and we are responsible as “controller” of that personal information for the purposes of those laws.

Key terms

It would be helpful to start by explaining some key terms used in this policy:	
We, us, our	WINNING THE FIGHT, INC.
Personal information	Any information relating to an identified or identifiable individual
Special category personal information	Personal information revealing racial or ethnic origin, political opinions, religious beliefs, philosophical beliefs or trade union membership Genetic and biometric data Data concerning health, sex life or sexual orientation

Personal Information We Collect About You

- Your name and contact information, including email address and telephone number
- [Information to enable us to check and verify your identity, e.g., your date of birth]
- [Your gender information[, if you choose to give this to us]]
- [location data[, if you choose to give this to us]]
- your billing information, transaction and payment card information
- [your personal[or professional] interests]
- [your professional online presence, eg LinkedIn profile]
- [your contact history, purchase history and saved items]
- [information from accounts you link to us[, eg Facebook]]
- [information to enable us to undertake credit or other financial checks on you]
- [Information about how you use our website, IT, communication and other systems]
- [your responses to surveys, competitions and promotions]
- [next]

This personal information is required to provide services to you. If you do not provide personal information we ask for, it may delay or prevent us from providing services to you.

How Your Personal Information is Collected

We collect most of this personal information directly from you—in person, by telephone, text or email and/or via our website. However, we may also collect information:

- [From publicly accessible sources]
- [Directly from a third party, e.g.]:
 - Sanctions screening providers;
 - Credit reference agencies;
 - Customer due diligence providers;
 - [next]]
- From a third party with your consent,
- From cookies on our website—for more information on our use of cookies, please see our cookies policy
- Via our IT systems, e.g.:.
 - [Automated monitoring of our websites and other technical systems, such as our computer networks and connections, CCTV and access control systems, communications systems, email and instant messaging systems;]
 - [any other relevant systems].

How and Why We Use Your Personal Information

Under data protection law, we can only use your personal information if we have a proper reason for doing so, e.g.:.:

- To comply with our legal and regulatory obligations;
- For the performance of our contract with you or to take steps at your request before entering into a contract;
- For our legitimate interests or those of a third party –or–
- Where you have given consent.

A legitimate interest is when we have a business or commercial reason to use your information, so long as this is not overridden by your own rights and interests.

The table below explains what we use (process) your personal information for and our reasons for doing so:

What we use your personal information for	Our reasons
To provide services to you	For the performance of our contract with you or to take steps at your request before entering into a contract
To prevent and detect fraud against you or Winning The Fight, Inc.	For our legitimate interests or those of a third party, ie to minimize fraud that could be damaging for us and for you
Conducting checks to identify our customers and verify their identity	To comply with our legal and regulatory obligations
Screening for financial and other sanctions or embargoes	
Other processing necessary to comply with professional, legal and regulatory obligations that apply to our business, eg under health and safety regulation or rules issued by our professional regulator	
Gathering and providing information required by or relating to audits, enquiries or investigations by regulatory bodies	To comply with our legal and regulatory obligations
Ensuring business policies are adhered to, eg policies covering security and internet use	For our legitimate interests or those of a third party, ie to make sure we are following our own internal procedures so we can deliver the best service to you

Operational reasons, such as improving efficiency, training and quality control	For our legitimate interests or those of a third party, ie to be as efficient as we can so we can deliver the best service for you at the best price
Ensuring the confidentiality of commercially sensitive information	For our legitimate interests or those of a third party, ie to protect trade secrets and other commercially valuable information To comply with our legal and regulatory obligations
Statistical analysis to help us manage our business, eg in relation to [our financial performance, customer base, product range or other efficiency measures]	For our legitimate interests or those of a third party, ie to be as efficient as we can so we can deliver the best service for you at the best price
Preventing unauthorized access and modifications to systems	For our legitimate interests or those of a third party, ie to prevent and detect criminal activity that could be damaging for us and for you To comply with our legal and regulatory obligations
Updating and enhancing customer records	For the performance of our contract with you or to take steps at your request before entering into a contract To comply with our legal and regulatory obligations For our legitimate interests or those of a third party, eg making sure that we can keep in touch with our customers about existing orders and new products
Statutory returns	To comply with our legal and regulatory obligations
Ensuring safe working practices, staff administration and assessments	To comply with our legal and regulatory obligations For our legitimate interests or those of a third party, eg to make sure we are following our own internal procedures and working efficiently so we can deliver the best service to you
Marketing our services and those of selected third parties to: —existing and former customers; —third parties who have previously expressed an interest in our services; —third parties with whom we have had no previous dealings.	For our legitimate interests or those of a third party, ie to promote our business to existing and former customers
[Credit reference checks via external credit reference agencies]	[For our legitimate interests or those of a third party, ie to ensure our customers are likely to be able to pay for our products and services]
External audits and quality checks, eg for accreditation and the audit of our accounts	For our legitimate interests or those of a third party, ie to maintain our accreditations so we can demonstrate we operate at the highest standards To comply with our legal and regulatory obligations

Promotional Communications

We may use your personal information to send you updates (by email, text message, telephone or post) about our services, including exclusive offers, promotions or new services.

We have a legitimate interest in processing your personal information for promotional purposes (see above “How and why we use your personal information”). This means we do not usually need your consent to send you promotional communications. However, where consent is needed, we will ask for this consent separately and clearly.

We will always treat your personal information with the utmost respect and never sell it with other organizations for marketing purposes.

You have the right to opt out of receiving promotional communications at any time by:

- contacting us at [contact details for marketing opt-out]
- using the ‘unsubscribe’ link in emails or ‘STOP’ number in texts
- [updating your marketing preferences on our [link to preference center]]

We may ask you to confirm or update your marketing preferences if you instruct us to provide further services in the future, or if there are changes in the law, regulation, or the structure of our business.

Who We Share Your Personal Information With

We routinely share personal information with:

- Third parties we use to help deliver our services to you, e.g., payment service providers, companies manufacturing products using the Deanna Protocol;
- Other third parties we use to help us run our business, eg marketing agencies or website hosts;
- Third parties approved by you, eg social media sites you choose to link your account to or third party payment providers;
- Our bank[s];
- [next].

We only allow our service providers to handle your personal information if we are satisfied they take appropriate measures to protect your personal information. We also impose contractual obligations on service providers relating to ensure they can only use your personal information to provide services to us and to you. We may also share personal information with external auditors, eg in relation to accreditation and the audit of our accounts.

We may disclose and exchange information with law enforcement agencies and regulatory bodies to comply with our legal and regulatory obligations.

We may also need to share some personal information with other parties, such as potential buyers of some or all of our business or during a re-structuring. Usually, information will be anonymized but this may not always be possible. The recipient of the information will be bound by confidentiality obligations.

Where Your Personal Information is Held

Information may be held at our offices and those of our third party agencies, service providers, representatives and agents as described above (see above: “Who we share your personal information with”).

Some of these third parties may be based outside the European Economic Area. For more information, including on how we safeguard your personal information when this occurs, see below: “Transferring your personal information out of the EEA”.

How Long Your Personal Information Will Be Kept

We will keep your personal information while you have an account with us or we are providing services to you. Thereafter, we will keep your personal information for as long as is necessary:

- To respond to any questions, complaints or claims made by you or on your behalf;
- To show that we treated you fairly;
- To keep records required by law.

We will not retain your personal information for longer than necessary for the purposes set out in this policy. Different retention periods apply for different types of personal information.

Transferring Your Personal Information Out of the EEA

To deliver services to you, it is sometimes necessary for us to share your personal information outside the European Economic Area (EEA), eg:

- Our headquarters’ offices are located outside the EEA;

- With your and our service providers located outside the EEA;
- If you are based outside the EEA;
- [Where there is an international dimension to the services we are providing to you.]

These transfers are subject to special rules under European and UK data protection law.

These non-EEA countries do not have the same data protection laws as the United Kingdom and EEA. We will, however, ensure the transfer complies with data protection law and all personal information will be secure. Our standard practice is to use standard data protection contract clauses that have been approved by the European Commission. To obtain a copy of those clauses [details of where they have been made available (where possible providing a link to the mechanism or information)].

If you would like further information please contact us (see ‘How to contact us’ below).

Your Rights

Access	The right to be provided with a copy of your personal information (the right of access)
Rectification	The right to require us to correct any mistakes in your personal information
To be forgotten	The right to require us to delete your personal information—in certain situations within the EEA
Restriction of processing	The right to require us to restrict processing of your personal information—in certain circumstances, eg if you contest the accuracy of the data
Data portability	The right to receive the personal information you provided to us, in a structured, commonly used and machine-readable format and/or transmit that data to a third party—in certain situations
To object	The right to object: —at any time to your personal information being processed for direct marketing (including profiling); —in certain other situations to our continued processing of your personal information, eg processing carried out for the purpose of our legitimate interests.
Not to be subject to automated individual decision-making	The right not to be subject to a decision based solely on automated processing (including profiling) that produces legal effects concerning you or similarly significantly affects you

For further information on each of those rights, including the circumstances in which they apply, see the General Data Protection Regulation.

If you would like to exercise any of those rights, please:

- [Complete a data subject request form—available on our website at [link] –or–
- Email, call, or write to us—see below: “How to contact us” –and–
- Let us have enough information to identify you [(e.g., your full name, address and customer or matter reference number))]
- Let us have proof of your identity and address (a copy of your driving license or passport and a recent utility or credit card bill)
- Let us know what right you want to exercise and the information to which your request relates

Keeping Your Personal Information Secure

We have appropriate security measures in place to prevent personal information from being accidentally lost, or used or accessed in an unauthorized way. We limit access to your personal information to those who have a genuine business need to access it. Those processing your information will do so only in an authorized manner and are subject to a duty of confidentiality. We also have procedures in place to deal with any

suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

How to Complain

We hope that we can resolve any query or concern you raise about our use of your information.

The General Data Protection Regulation also gives you right to lodge a complaint with a supervisory authority, in particular in the European Union (or European Economic Area) state where you work, normally live, or where any alleged infringement of data protection laws occurred..

Changes to This Privacy Notice

This privacy notice was published on [date] and last updated on [date].

We may change this privacy notice from time to time—when we do we will inform you via [mechanism for informing the data subject of changes to the notice, e.g., our website or other means of contact such as email].

How to Contact Us

Please contact us by mail, email or telephone if you have any questions about this privacy policy or the information we hold about you.

Our contact details are shown below:

Our contact details

[contact address]

[contact email address]

[contact telephone number]

Do You Need Extra Help?

If you would like this notice in another format (for example: audio, large print, braille) please contact us (see “How to contact us” above).

