

THE CLOUDFIT PRIVACY POLICY

Document Ref.	DPRIV-DOC-01-1
Version:	1
Dated:	062024

Hi! We're CloudFit.

We create bespoke health journeys by blending cutting-edge AI with expert personal training insights to elevate your wellness, productivity and morale through plans that understand and adapt to your needs.

This is where we let you know how we use your data and protect your privacy. Our Privacy Notice is 'layered' so you can either read it in full or use the table below to jump to a specific section.

<i>Our role in your privacy</i>	<i>3</i>
<i>Our responsibilities</i>	<i>3</i>
<i>Your responsibilities</i>	<i>3</i>
<i>The personal data we collect</i>	<i>3</i>
<i>When and how we collect personal data and our purposes</i>	<i>4</i>
<i>Our lawful bases for processing your data</i>	<i>6</i>
<i>Other organisations we use to deliver CloudFit</i>	<i>7</i>
<i>Transferring your personal data internationally</i>	<i>9</i>
<i>How long we store your data for</i>	<i>9</i>
<i>Data Deletion</i>	<i>9</i>
<i>Securing your data</i>	<i>9</i>
<i>Your control over your personal data</i>	<i>10</i>
<i>Your choices</i>	<i>10</i>
<i>Personal data autonomy</i>	<i>10</i>
<i>Cookies</i>	<i>10</i>
<i>Direct Marketing</i>	<i>10</i>
<i>Your rights</i>	<i>11</i>
<i>Your right to be informed</i>	<i>11</i>
<i>Your right of access</i>	<i>11</i>
<i>Your right to rectification</i>	<i>11</i>
<i>Your rights to erasure, restrict processing and object to processing</i>	<i>11</i>

Your right to data portability _____ **12**

Complaints _____ **12**

Our role in your privacy

If you visit our website, sign up to our waiting list, or are a user of the CloudFit app provided as a benefit by your employer, then this policy applies to you.

If you are interested in how your employer uses your data, you should check their Employee Privacy Notice (sometimes called a 'Privacy Policy') but we will let you know what data we get from them to provide you with the app and how we use it.

Our responsibilities

If use our CloudFit app, or provide us with information to contact you about our hyper-personalised bespoke health journeys, then we act as the 'data controller.'

We take our responsibility to protect the data in our custody seriously. A key part of that is providing you with transparent information that empowers you to make choices about your data and privacy.

We're as fed up as you about terms and conditions with thousands of words so have done our best to make this clear and concise whilst giving you all the information you need and required by law.

So, before we dive in, a key requirement:

- our company is registered in the UK as CloudFit Enterprise Limited and
- our address is 591 London Road, Cheam, Sutton, England, SM3 9AG.

You can contact us using this form [<https://forms.office.com/e/Rgks4eC0Nq>] if you have any questions.

Your responsibilities

- Read this privacy notice and any future versions (we'll message if we make changes)
- Check any contracts or terms of use as they may contain complementary or additional information about how we process your data.
- Only provide us with information about others that you are authorised to. By submitting it, you are confirming you have confirmed authorisation to do so. If we receive data about someone from other sources, we will only process it for the specific reasons it was provided.

The personal data we collect

We collect your data from your employer, from you and from third party applications.

We group the different categories of personal data by type so that you can understand what data we collect.

Type of Personal Data	Categories	Source
Basic Personal Details	Name, Date of Birth	You
Contact Information	Email Address	Your Employer
CloudFit Account Information	Username, Password	You
Consents & System Preferences	Records of your Consent, Contact & Notification Preferences	You
P h y s i c a l Measurements	Height, Weight, Body Mass Index (BMI)	You
L i f e s t y l e Information	Routine, Coaching Preferences	You
Fitness Information	Exercise Experience, Exercise Routine, Exercise Preferences	You
Health Information	Injury Information, Medical Diagnoses (e.g. COPD), Respiratory Performance, Doctor's Exercise Advice, Apple Health Data	- You - Apple Health

When and how we collect personal data and our purposes

We collect your personal data at different points on your journey with us. This starts by receiving your email address from your employer once you have confirmed to them you wish to use CloudFit. We use this to contact you to get you set up.

When	We Collect	And Use It To
Your employer confirms your interest	Contact Information	Get in touch with you to join us

When	We Collect	And Use It To
------	------------	---------------

You complete onboarding forms	• Basic Personal Details • Consents & System Preferences • P h y s i c a l Measurements • Lifestyle Information • Fitness Information • Health Information	• Get you onboarded to CloudFit • Enter into our contract with you through our terms and conditions
-------------------------------	---	--

When	We Collect	And Use It To
Your activity is updating Apple Health	• P h y s i c a l Measurements • Lifestyle Information • Fitness Information • Health Information	• Understand your activity, health and fitness • Provide you with tailored adaptive wellness plans

When	We Collect	And Use It To
You meet with our high-performance coaches	• Basic Personal Details • P h y s i c a l Measurements • Lifestyle Information • Fitness Information • Health Information	• Understand your activity, health and fitness • Provide you with elite-level high-performance coaching advice and guidance • Provide you with tailored adaptive wellness plans

When	We Collect	And Use It To
------	------------	---------------

During your ongoing use of the CloudFit app	• Contact Information • Basic Personal Details • Consents & System Preferences • P h y s i c a l Measurements • Lifestyle Information • Fitness Information • Health Information	• Keep your information up to date • Provide you with the CloudFit product and services • Assess and improve CloudFit product and services • Analyse your health data using our proprietary AI applications to provide a basis for coaching recommendations and tailored adaptive wellness plans. • Operate your account in line with our terms and conditions • Update you about our products and services • Comply with our legal obligations
---	--	---

Our lawful bases for processing your data

We only process your personal data for specific purposes and when we have a lawful basis to do as, in line with data protection law. The lawful bases we use, and the purposes based upon them, are:

Contractual Obligations

Where it is necessary to use your personal data to enter into a contract with you at your request or to carry out our obligations under a contract with you.

- Enter into our contract with you through our terms and conditions
- Provide you with the CloudFit product and services
- Operate your account in line with our terms and conditions

Consent

Where you have given us your consent after reading this privacy notice and having been informed of the specific reasons that we will use your data for that require your consent.

- Understand your activity, health and fitness
- Provide you with tailored adaptive wellness plans
- Provide you with elite-level high-performance coaching advice and guidance
- Analyse your health data using our proprietary AI applications to provide a basis for coaching recommendations and tailored adaptive wellness plans.

Legitimate Interests

Where it is necessary to use your personal data and we have a valid reason to do so that doesn't outweigh your rights and interests.

- Enter into our contract with you through our terms and conditions
- Provide you with the CloudFit product and services
- Operate your account in line with our terms and conditions

Legal Obligation

Where it is necessary for us to comply with a law or, where they have the force of law or are mandated by a regulator, official standards or guidelines.

- Comply with our legal obligations (e.g. tax, data and other legal requirements)
- Keep your information up to date

If you have any concerns about how we use your data or want to understand more about our lawful bases, please get in touch with us by using this form [<https://forms.office.com/e/Rgks4eC0Nq>].

Other organisations we use to deliver CloudFit

We use other organisations that are specialists and leaders in what they do. This means that we can focus on making CloudFit the best product it can be for you. When we do this, it may be necessary for these organisations to process your personal data on our behalf.

We work with the following types of organisations to operate our business and deliver the CloudFit app to you:

Type	Examples	Purposes
Health Apps	• Apple Health (Privacy White Paper , Health App Privacy Policy , Health Product Page)	• Collecting health data to inform our analysis and recommendations
Cloud Storage / Processing Providers	• Amazon Web Services (AWS) (Privacy Notice)	• Storing your data used to provide your with insights

L a r g e L a n g u a g e M o d e l (LLM) P r o v i d e r s	• OpenAI (Privacy Notice)	• Analysing your data to understand your health, fitness and preferences. • Developing tailored adaptive health and wellness plans and recommendations based on your profile.
P r o d u c t i v i t y a n d c o l l a b o r a t i o n t o o l s	• Microsoft 365 Office Suite (Privacy Centre)	• Operating our business and storing business documentation • Dealing with issues you raise or when managing your health journey.
C o m m u n i c a t i o n t o o l s	• MS Teams • Slack (Privacy Policy) • Discord (Privacy Policy)	• Communicating internally to operate our business
P r o d u c t D e v e l o p m e n t T o o l s	• Linear (Privacy Policy)	• Building the CloudFit app to continually expand and improve the products and services we provide you with.

When using third party organisations:

- We make sure that we have a lawful basis to do so, that our use of these organisations is fair and we tell you about it. (This principle is known as Lawfulness, Fairness and Transparency)
- We only do so for limited purposes as communicated to you in this privacy notice. (Purpose Limitation)
- We only use your personal data to the extent required to do what we need to provide you with CloudFit or solve issues relating to your CloudFit use. (Data Minimisation)
- We make sure that the data we input to these tools are correct and up to date so that the outcomes you experience are based on accurate information. (Accuracy)
- We only keep your data in these tools for as long as required to achieve our purpose for doing so. (Storage limitation)
- We make sure that data is used in a secure way and that controls are in place to protect your privacy. (Security)
- We take ownership of our decisions to use these organisations and protection your personal data when we do so. (Accountability)

Transferring your personal data internationally

Where it is necessary to transfer personal data internationally, we opt in to the use of UK and Europe Data Storage regions so that your data is kept within GDPR-protected territories. Where necessary to transfer personal data further afield we apply other controls to protect your data.

These controls include signing contracts with organisations that facilitate these transfers and process personal data outside the UK and Europe and conducting impact assessments when personal data when doing so, if required.

For more information on how we protect your personal data when transferring it internationally, you can contact us by using this form [<https://forms.office.com/e/Rgks4eC0Nq>].

How long we store your data for

We will retain your Personal Data for as long as you maintain an account or as otherwise necessary to provide you CloudFit products and services. We will also retain your Personal Data as necessary to comply with our legal obligations, resolve disputes, and enforce our terms and conditions, legal agreements and policies.

Where we no longer need to process your Personal Data for the purposes set out in this Privacy Policy, we will delete your Personal Data from our systems.

We will also retain usage data for internal analysis and performance purposes. Usage data is generally retained for a shorter period, except when this data is used to strengthen the security or to improve the functionality CloudFit, or we are legally obligated to retain this data for longer time periods.

Data Deletion

Where we are processing your personal data based on your consent, you can contact us to withdraw your consent and we will dispose of your personal data. We will tell you where we are unable to continue providing you with CloudFit products or services when you make your request so you understand how this will affect your use of CloudFit.

We will also delete your Personal Data upon your direction to delete your account save where we are legally obligated to retain this data for longer.

Securing your data

We take the security of your personal data seriously and are committed to protecting your personal information. To ensure this, we have implemented a variety of appropriate technical and organisational measures, including:

- **Encryption:** We use advanced encryption methods to protect your data during transmission and storage, ensuring that only authorized parties can access it.
- **Access Controls:** We restrict access to your data on a need-to-know basis, and these individuals are trained in data protection requirements.
- **Data Protection Policies:** We maintain policies which set out how we protect your personal data which our people must comply with.
- **Secure Systems:** Our systems are designed with the latest security technologies to prevent unauthorized access, loss, or misuse of your data.
- **Third Party Security:** We only engage with third parties who will protect your personal data to an equivalent level that we do.
- **Incident Response:** We have a robust incident response plan in place to quickly address any data breaches or security incidents, minimizing potential harm.
- **Regular Reviews:** We regularly review our security practices to identify and address potential vulnerabilities in our systems and processes.

By implementing these technical and organisational measures, we aim to ensure the safety and confidentiality of your personal data. If you have any concerns about the security of your data, please contact us.

Your control over your personal data

Your choices

You can make the following choices in relation to your personal data:

Personal data autonomy

You can choose not to provide us with personal data

- If you choose to do this (for example by not allowing Cloud Fit to access your Apple Health data) you can continue to use our website, but we will not be able to provide you with our cutting-edge-AI and expert training insights without personal data.

Cookies

You can update your cookie preferences

- You can block cookies by activating a setting on your browser allowing you to refuse cookies, or by using the cookie tool on our website. You can also delete cookies through your browser settings. If you turn off cookies, you can continue to use the website and CloudFit, but certain services may not work effectively.

Direct Marketing

You can choose whether we use your data for marketing

- We will inform you if we intend to use your data to provide you of information about our products and services. You can opt out from marketing by using this form [<https://forms.office.com/e/Rgks4eC0Nq>].

Your rights

Under data protection law, you have rights.

You don't usually need to pay a fee to exercise your rights. If you make a request, we have one calendar month to respond to you.

To exercises any of your rights, you can contact us by using this form [<https://forms.office.com/e/Rgks4eC0Nq>].

Your right to be informed

You have the right to receive transparent privacy information about how your personal data is processed so that you can make informed choices about your data and privacy.

- We provide this information through this privacy notice.
- We'll always aim to do so in a concise, intelligible and easily accessible way, using clear and plain language.
- We'll leave 'legalese' to the lawyers as much as possible without losing the meaning and clarity required.

Your right of access

You have the right to ask us for copies of your personal data.

- We will provide you with the information within one month of your request, unless doing so would adversely affect the rights and freedoms of another (e.g. another person's confidentiality or intellectual property rights).
- We'll tell you if we can't meet your request for that reason.

Your right to rectification

You have the right to ask us to rectify personal data you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.

- We will update your information upon request if it is incorrect.
- You can keep much of your information up to date within the CloudFit app.

Your rights to erasure, restrict processing and object to processing

You have the right to ask us to erase, restrict or object to the processing of your personal data in certain circumstances.

- You can do this by asking us to erase, restrict or stop processing any personal data we hold about you, if it is no longer necessary for us to hold it to provide you with our CloudFit app and related services.
- These rights don't always apply (for example, if we have a contract with you), but we'll tell you if this is the case when you make your request.

Your right to data portability

You have the right to ask that we transfer the personal data you gave us to another organisation, or to you, in certain circumstances.

Your right to withdraw consent

When we use consent as our lawful basis you have the right to withdraw your consent.

Your right to have automated decisions reviewed by a human

Where your personal data is subject to “automated decision-making” that affects your legal rights or other similar rights (for example, where AI is used to take decisions impacting your finances or job prospects), you have the right to have that reviewed by a member of our team.

We do not expect any automated processing at CloudFit to have such effects but we are always happy to review any requests you make relating to this right.

Complaints

You can make a complaint relating to your privacy.

If you have any concerns about our use of your personal data, you can make a complaint to us and contact our Data Protection Officer (DPO) by using this form [<https://forms.office.com/e/Rgks4eC0Nq>].

If you remain unhappy with how we've used your data after filing a complaint with us, you can also complain to the Information Commissioner's Office (ICO).

The ICO's can be contacted at:

- Helpline number: 0303 123 1113
- Website: <https://www.ico.org.uk/make-a-complaint>