**BetterBe Privacy Policy**

**This privacy policy should be read in conjunction with the BetterBe Services Agreement.**

If you are a BetterBe account holder, just visiting the BetterBe website ([www.Betterbegroup.com](http://www.Betterbegroup.com)) (“**the** **Website**”), using the BetterBe On Track App (“**the BetterBe App**”), or using any other Services we provide, this privacy policy applies to you.

Any information that directly identifies you (such as your name), and any information that can be used to identify you (such as your IP address), is “**personal information**”.We are committed to protecting and respecting your privacy. This privacy policy tells you when we collect personal information from you, how we use it, and how we disclose it to third parties. This privacy policy does not apply to how third parties use your personal information.

1. **Who we are**
   1. We are the BetterBe Group Limited, an Isle of Man company with registration number 136122C, having its registered offices at The Bungalow, Ballamanagh Road, Sulby, IM7 2HB, Isle of Man. In this policy, we refer to ourselves as “**BetterBe**”, “**we**”, “**us**”, or “**our**”.
   2. We are responsible for the Website and the BetterBe App.
   3. We are registered with the Isle of Man Information Commissioner under registration number R002805.
   4. Our data protection officer is Lisa Burri. You can reach her via email at support@betterbegroup.com.
2. **When and how we collect data**

From the first moment you interact with us, we are collecting data. Sometimes you give us information directly (such as when you tell us your name when registering an account) and sometimes we collect data about you, either automatically (such as when we note your IP address) or from other sources, like publicly available websites or from a trusted data supplier.

* 1. You give us information directly when you:
     1. register an account with us;
     2. download content;
     3. place an order on the Website or purchase any Services;
     4. participate in messaging or social media functions on the Website or the BetterBe App;
     5. share data regarding your health or activities (such as the number of steps you took or the distance you travelled);
     6. share emails with us;
     7. chat with us for customer support; or
     8. opt-in to marketing messages.
  2. We collect information about you automatically or from other sources when you:
     1. browse any page of the Website;
     2. use the Website or the BetterBe App;
     3. communicate with us in any way.

1. **Types of data we collect**

We strive to collect only the personal information that we need. We may collect:

* 1. Personal details

Your name, address, telephone number, email address, date of birth, age, and your gender.

* 1. Your account details

Your username and password.

* 1. The relationship between individuals with the same account, for example, if you have a family account.
  2. Information relating to your health

Information that you share with us regarding your physical or mental health or condition. This may include information that can be used to make inferences about, or detect your health status.

* 1. Information relating to your fitness

The information you share with us regarding your fitness and exercise activities, such as the number of steps you took or the distance you travelled.

* 1. Employment information

The name of your employer and your job title.

* 1. Financial information

Your bank account number, sort code, credit/debit card details.

* 1. Device information that identifies you

Your IP address, login information, browser type and version, time zone setting, browser plug-in types, geolocation information about where you might be, operating system and version, etc.

* 1. Data on how you use the Services

Your URL clickstreams (the path you take through the Website), products/services viewed, page response times, download errors, how long you stay on our pages, what you do on those pages, how often, and other actions.

* 1. Location data

We will request you to consent to the use of location services every time you use the BetterBe App. You may disable this functionality at any time.

* 1. Other information you provide us

Details such as the content of your communications with us, including customer support, social media, and information that you post on the BetterBe App or the Website.

1. **How and why we use your data**

We process your data to:

* 1. provide the Services to you and to improve them;
  2. create and manage your account with us;
  3. process any transactions concerning the Services;
  4. manage our relationship with you and to communicate with you regarding your account;
  5. notify you about changes to the Services or to our Services Agreement or policies;
  6. administer the Website and the BetterBe App, and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
  7. allow you to participate in interactive features of the Services;
  8. protect computers, devices, and the information they hold;
  9. detect, investigate, report and seek to prevent fraud and financial crime, managing risk for us and account holders;
  10. provide you with information about other goods and services we offer, or which third parties offer within the BetterBe App;
  11. measure or understand the effectiveness of advertising we serve to you and others, and to deliver relevant advertising to you;
  12. make suggestions and recommendations to you and other users of the Services;
  13. respond to complaints and seek to resolve them;
  14. run our business in an efficient and proper way;
  15. exercise our rights as set out in agreements; and
  16. comply with the law.

1. **Cookies**

We use cookies to distinguish you from other users of the Services. This helps us to provide you with a good experience when you browse the Website, to improve the Services, and to help us better understand user behaviour. If you prefer us not to use cookies, please disable cookies on your browser. If you use your browser settings to disable, reject, or block cookies (including essential cookies), certain parts of the Website or BetterBe App will not function fully. In some cases, they may not be accessible at all.

1. **How long we keep your personal information**

If you are an account holder, we will keep your personal information for as long as your account is active, or until you ask us to delete your personal information. If you are not an account holder, we will keep your personal information only for so long as necessary to fulfil the purposes for which it was collected.

1. **Who we share your personal information with**

We may share your personal information with companies affiliated to us, service providers who act on our behalf, our partners, or others if you direct us to or if you consent to us doing so. We do not share your personal information with third parties for their own marketing purposes. Third parties are required to protect your personal information. Entities we may share your personal information with include:

* 1. any member of the BetterBe Group, which means our subsidiaries, our ultimate holding company and its subsidiaries;
  2. service providers who perform tasks on our behalf, such as processing or storing data;
  3. business partners, including charities, with whom we partner to provide services or other offerings to you;
  4. others, at your direction or with your consent. We will ask your permission prior to sharing your personal information with others; and
  5. third parties to whom we are under a duty to disclose or share your personal data in order to comply with any legal obligation; or to protect the rights, property, or safety of BetterBe, our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

1. **Your privacy choices**

You may at any time exercise your rights by sending us an email at [support@betterbegroup.com](mailto:support@betterbegroup.com)

* 1. Access to information

You can at any time request a copy of information we hold about you, as well as request details of why we have that information, who has access to that information and how we obtained that information. Once we have received your request we will respond within 30 days, unless doing so would adversely affect the rights and freedoms of others (e.g. another person’s confidentiality or intellectual property rights). We’ll tell you if we can’t meet your request for that reason. Any access request will be subject to a fee of £10 to meet our costs in providing you with these details.

* 1. Correcting inaccurate personal information

You can ask us to correct any personal information that you think is wrong, out of date or incomplete. If you do, we will take reasonable steps to check the accuracy of the information and correct it.

* 1. Objecting to profiling

You can object to us using your data for profiling you or making automated decisions about you.

* 1. Porting your personal information to another service provider.

We will give you a copy of your personal information in a commonly used, machine-readable format should you require us to do so.

* 1. Deleting your personal information

You can ask us to erase any personal information we hold about you, if it is no longer necessary for us to hold the information for purposes of your use of the Services. There may be legal reasons why we need to keep the information, and we’ll tell you if this is the case.

* 1. Withdrawing consent

You may at any time withdraw your consent to the processing of your personal information.

* 1. Complaints about the processing of your personal information

You have the right to lodge a complaint regarding our use of your data. Please tell us first, so we have a chance to address your concerns. If we fail in this, you can address any complaint to the Isle of Man Information Commissioner’s Office, either by calling their helpline or as directed on their website at www.inforights.im.

1. **Choosing not to give us personal information**

You can choose not to provide us with personal information. If you choose to do this, you can continue to use the Website and browse its pages, but without personal information you will not be able to use the App, and we will not be able to process transactions, register an account for you or provide additional Services to you.

1. **Where we store your personal information**

The personal data we collect is processed and stored either at our offices in the Isle of Man or in AWS servers in the UK.

1. **Transfer of personal information between countries**

We will transfer your personal information outside of the UK only to follow instructions by you to do so, or to comply with a legal obligation to do so. If we transfer or store your information outside the UK, we will take steps required by law to ensure that your privacy rights continue to be protected as outlined in this privacy policy.

1. **Changes to this privacy policy**

Any changes to this privacy policy will be posted on the Website or the BetterBe App. Where appropriate, we will notify you via e-mail of any changes.