
PRIVACY POLICY

This privacy policy applies between you, the User of this App, and Slim2Win Ltd, the owner and provider of this App. Slim2Win takes the privacy of your information very seriously. This privacy policy applies to our use of any and all Data (defined below) collected by us or provided by you in relation to your use of the App.

This policy also applies to your use and engagement with our website – www.slim2win.co.uk

Please read this privacy policy carefully and contact us if you have any questions using the contact details set out below.

Definitions and interpretation

1. In this privacy policy, the following definitions are used:

Data	collectively all information that you submit to Slim2Win via the app. This definition incorporates, where applicable, the definitions provided in the EU General Data Protection Regulation 2018 (GDPR);
DPA 2018	The Data Protection Act 2018 as amended from time to time;
'Slim2Win', or 'us', 'we' etc	Slim2Win is a trading name of Slim 2 Win Ltd, a company incorporated in England and Wales with registered number 11981163 whose registered office is at 6 Smugglers Mews, 114 Brighton Road, Horsham, West Sussex, RH13 5DE;
User or you	any third party that accesses / uses the App and is not either (i) employed by Slim2Win and acting in the course of their employment or (ii) engaged as a consultant or otherwise providing services to Slim2Win and accessing the app in connection with the provision of such services;
App	the application (app) that you are currently using, i.e. Slim2Win, and any associated apps.
Website	The website at www.slim2win.co.uk

2. In this privacy policy, unless the context requires a different interpretation:

- a. the singular includes the plural and vice versa;
- b. references to sub-clauses, clauses, schedules or appendices are to sub-clauses, clauses, schedules or appendices of this privacy policy;

- c. a reference to a person includes firms, companies, government entities, trusts and partnerships;
- d. "including" is understood to mean "including without limitation";
- e. reference to any statutory provision includes any modification or amendment of it;
- f. the headings and sub-headings do not form part of this privacy policy.

Scope of this privacy policy

- 3. This privacy policy applies only to the actions of Slim2Win and Users with respect to the App and or Website, or otherwise when you register to use our services. It does not extend to any websites, forums, apps or other online resources that can be accessed from the App or the Website including, but not limited to, any links we may provide to social media websites.

Data collected

- 4. We collect personal Data directly from you via the App or via other communications between us when you make enquiries with us or engage with our services and, to a more limited extent, when you visit the Website. We may collect the following Data, from you:
 - a) Your personal details, such as your name, email address, postal address, telephone or mobile number (so that we can contact you where we are lawfully able to do so in accordance with this policy) (**Contact Data**);
 - b) Limited personal details concerning your health and wellbeing, such as your age, gender, height, weight, BMI (so that you can engage with the App and enter an appropriate weight loss challenge) (**Wellbeing Data**);
 - b) Content that you upload to the App for the purposes of verifying or tracking your engagement with a particular weight loss challenge – this may include photographs and or videos you make of yourself (**Personal Content**);
 - c) Banking and financial details, which may include your bank account and card details (**Financial Data**);
 - d) Your account login details, such as your username and password (it is your responsibility to keep these safe) (**Account Data**).
- 5. In addition, we may monitor your use of the Website through the use of cookies and similar tracking devices (**Cookie Data**). For example, we may monitor how many times you visit, which pages you go to, traffic data, location data and the originating domain name of a user's internet service provider. This information helps us to build a profile of our users. Some (but not all) of this data will be aggregated or statistical, which means that we will not be able to identify you individually. Please see further the section on '**Use of cookies**' below.

Our use of Data

6. For purposes of the GDPR 2018 and the DPA 2018, Slim2Win is the "controller" of Data. This means that, under the DPA 2018 and the GDPR 2018, we may control and process your personal data in accordance with this Policy and the law.
7. We will only retain your Data for only so long as is needed in accordance with our retention policy. Ordinarily, this is six and a half years from the point at which you deactivate your account, unless you consent to receive marketing materials, in which case we shall retain your Personal Data until such a time as the business ceases to operate, or you withdraw your consent to be contacted.
8. Unless we are obliged or permitted by law to do so, and subject to any third party disclosures specifically set out in this policy, your Data will not be disclosed to third parties, save for the purposes and on the occasions identified in this Policy.
9. All personal Data is stored securely in accordance with the principles of the GDPR. For more details on security see the clause below (Security).

Our Obligations to You

10. As the 'controller' of your personal information, we will ensure that the personal information we hold about you is:
 1. used lawfully, fairly and in a transparent way.
 2. collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
 3. relevant to the purposes we have told you about and limited only to those purposes.
 4. accurate and kept up to date.
 5. kept only as long as necessary for the purposes we have told you about.
 6. kept securely.

Legal basis for Use of your Data

11. We can only process your personal information where we have a legal right to do so under the DPA 2018 or the GDPR 2018. Generally, we rely on the following grounds:
 - Article 6(1)(a) – processing is conducted with your **consent** to process personal data for specified purposes
 - Article 6(1)(b) – processing is necessary for the performance of our **contract** to provide services to you, or for preparing to enter into such a contract with you
 - Article 6(1)(c) – processing is necessary for us to demonstrate **compliance with the law**

- Article 6(1)(f) – to process your personal data in pursuit of our **legitimate interests**

12. Below, we have set out the particular types of Data that we collect, the reasons for this and the legal basis for doing so:

Type of Data	Reasons for Processing	Legal Basis
Contact Data, Financial Data Account Data	Internal record keeping	Legitimate interests
All types of Data	Improvement of our products / services, including using your Data for research purposes so that we can better understand our services and how they are used and perceived for the purposes of making improvements	Legitimate interests
Contact Data, Wellbeing Data	transmission by email of promotional materials that may be of interest to you	Consent
Contact Data	contact for market research purposes which may be done using email, telephone, fax or mail. Such information may be used to customise or update the app	Consent
All types of Data	to deter, prevent, or detect any activities conducted in breach of the Slim2Win T&Cs.	Legitimate interests
Wellbeing Data	to make sure we offer our services to eligible persons	Legal obligation
All types of Data	crime detection, prevention, and prosecution	Legitimate interests
Contact Data, Account Data	to verify your identity and establish the source of funding in any transaction	As part of our contract with you

AI types of Data	to assess and manage any potential risks and prevent inappropriate use of the app	As part of our contract with you
Contact Data	To communicate with you about your use of the app and our services and in connection with a particular weight loss challenge, and to notify you of changes to our terms of use and this policy	As part of our contract with you
Wellbeing Data	To enable the app to determine and manage your engagement with a weight loss challenge	As part of our contract with you
Personal Content	To manage and verify your participation in a weight loss challenge	As part of our contract with you
Financial Data	To receive payments from you and pay you for successful challenges	As part of our contract with you
Account Data	To manage, monitor, assess risks in connection with and regulate our contractual relationship with you (for example, by limiting or prohibiting access where you breach our terms of use)	Legitimate interest
Contact Data	To enable us to receive and respond to questions and comments from you	As part of our contract with you
All types of Data	To identify, investigate and expose suspected unlawful, fraudulent or improper activity connected with the app. This may involve disclosure of information, which may include personal Data, to the appropriate authorities	Compliance with the law; legitimate interests

Third party websites and services

13. Slim2Win may, from time to time, employ the services of other parties for dealing with certain processes necessary for the operation of the App and the Website. The providers of such services do not have access to certain personal Data provided by Users of the App or Website.

Links to other websites and apps

14. The App / Website may, from time to time, provide links to websites and other apps. We have no control over such websites and apps; we are not responsible for the content of these websites or apps. This Policy does not extend to your use of such websites or apps. You are advised to read the privacy policy or statement of other websites and apps prior to using them. Your use of third party websites and apps is at your own risk.

Changes of business ownership and control

15. Slim2Win may, from time to time, expand or reduce our business and this may involve the sale and/or the transfer of control of all or part of Slim2Win. Data provided by Users will, where it is relevant to any part of our business so transferred, be transferred along with that part and the new owner or newly controlling party will, under the terms of this privacy policy, be permitted to use the Data for the purposes for which it was originally supplied to us.
16. We may also disclose Data to a prospective purchaser of our business or any part of it.
17. In the above instances, we will take reasonable steps with the aim of ensuring your privacy is protected.

Direct Marketing

18. Slim2Win has a policy of 'privacy by design', and your Data will not be used for the purposes of direct marketing, unless you specifically request to receive such materials. Slim2Win will not share your data with third parties without specific consent from you for marketing purposes. We will not contact you for the purposes of direct marketing unless you have asked us to do so. However, if you have asked us to do so and later you change your mind, you can opt-out at any time with no hassle. To do this, just let us know. See further '**Your rights**' below for details about how to contact us.

Transferring your information outside of Europe

19. We may store your Data temporarily on our cloud service operated by Microsoft. We have taken appropriate steps to satisfy ourselves that your Data will be secure during this process; we have a contractual relationship with Microsoft that underpins this. As part of that security, Microsoft may store your data in one or more of its international data centres, meaning that your data may be stored temporarily outside of the European Economic Area. If you have any concerns about this, please contact us using the details below.

Sharing Data with Third Parties

20. We will only share your Data with third parties if you have given express consent for us to do so or there is a legal basis for doing so. In certain circumstances, it may be in our legitimate interests to pass your Data to a third party for certain limited reasons. These third parties will only process your personal Data on our instructions and we will ensure that adequate measures are in place to ensure that your personal Data is only processed where it is lawful and secure to do so, although we are not directly responsible for the actions and inactions of such third parties This may include:
- **Our website and app provider** to enable us and them to deliver their service to us, carry out analysis and research on demographics, interests and behaviour of our users and supporters to help us gain a better understanding of them to enable us to improve our services. This may include connecting Data we receive from you to Data available from other sources. Your personally identifiable Data will only be used where it is necessary for the analysis required, and where your interests for privacy are not deemed to outweigh their legitimate interests in developing new services for us.
 - **Our professional advisors** and agents for the purposes of advising and representing us in any matter connected with your account or your use of the app upon which we legitimately consider that advice or representation is needed.
 - We share transaction data with **our payment services providers**, but only to the extent necessary for the purposes of processing your payments, refunding such payments and dealing with complaints and queries relating to such payments and refunds
 - **Advertising agencies**. Where you have consented to us doing so, we may use your personal Data for the purposes of providing targeted advertising to you.

Functionality of the App an Website

21. It is important that the information we hold about you is accurate in order for us to comply with our legal obligations and to provide you with the best possible service. We therefore ask that your personal Data is up to date at all times. You may update your personal Data from within your account in the app or by using the contact details set out in this Policy.
22. To use all features and functions available on the Website, you may be required to submit certain Data, particularly Cookie Data. You may restrict your internet browser's use of Cookies. For more information see the clause below (**Cookies**).

Your Rights

23. You have the right to ask for a copy of any of your personal Data held by Slim2Win (where such Data is held), as is your right to access under GDPR. There will be no charge for this provision (except where requests are repetitious or unreasonable), and we will provide the data within 30 days of receipt of your request.

- Any requests for Access or restriction must be made in writing to the Data Protection Officer through our postal address, or by email to: support@slim2win.co.uk
24. You have various rights under the Act and the GDPR 2018 and the DPA 2018, including the following rights:
- **Right to object:** If we are using your data because we deem it necessary for our legitimate interests to do so, and you do not agree, you have the right to object. We will respond to your request within 30 days (although we may be allowed to extend this period in certain cases). Generally, we will only disagree with you if certain limited conditions apply.
 - **Right to withdraw consent:** Where we have obtained your consent to process your personal data for certain activities (for example, providing you with services), or consent to market to you, you may withdraw your consent at any time.
 - **Data Subject Access Requests (DSAR):** Just so it's clear, you have the right to ask us to confirm what information we hold about you at any time, and you may ask us to modify, update or delete such information. At this point we may comply with your request or, additionally do one of the following:
 - we may ask you to verify your identity, or ask for more information about your request; and
 - where we are legally permitted to do so, we may decline your request, but we will explain why if we do so.
 - **Right to erasure:** In certain situations (for example, where we have processed your data unlawfully), you have the right to request us to "erase" your personal data. We will respond to your request within 30 days (although we may be allowed to extend this period in certain cases) and will only disagree with you if certain limited conditions apply.
 - **Right of data portability:** If you wish, you have the right to transfer your data from us to another data controller. We will help with this – either by directly transferring your data for you, or by providing you with a copy in a commonly used machine-readable format.
 - **Right to lodge a complaint with a supervisory authority:** You also have the right to lodge a complaint with your local supervisory authority, details of which can be found below.
 - Any requests for Access, or to exercise any other right in connection with your Data, must be made in writing to the Data Protection Officer through our postal address, or by email to: support@slim2win.co.uk

25. We may ask you to provide us with proof of your identity. Please do not be offended; this may occur even if we know you. It is a requirement of the GDPR in some cases.

Security

26. Data security is of great importance to Slim2Win and to protect your Data we have put in place suitable physical, electronic and managerial procedures to safeguard and secure Data collected via the App. To use all features and functions available on the App and Website, you may be required to submit certain Data.
27. If password access is required for certain parts of the app, you are responsible for keeping your password and other Account Data confidential.
28. We endeavour to do our best to protect your personal Data. However, transmission of information over the internet, or via wifi, is not entirely secure and is done at your own risk. We cannot ensure the security of your Data transmitted to the app and your use of the App and Website is generally at your own risk.

Cookies

29. The Website may place and access certain Cookies on your computer. Slim2Win uses Cookies to improve your experience of using the Website and to improve our range of services. Slim2Win has carefully chosen these Cookies and has taken steps to ensure that your privacy is protected and respected at all times.
30. All Cookies used by the Website are used in accordance with current UK and EU Cookie Law.
31. Before the Website places Cookies on your device, you will be presented with a pop-up requesting your consent to set those Cookies. By giving your consent to the placing of Cookies, you are enabling Slim2Win to provide a better experience and service to you. You may, if you wish, deny consent to the placing of Cookies; however certain features of the Website may not function fully or as intended.
32. This Website may place the following Cookies:

- *Strictly necessary cookies*

These are Cookies that are required for the operation of the Website. They include, for example, cookies that enable you to log into secure areas of the Website, if any.

- *Analytical/performance cookies*

They allow us to recognise and count the number of visitors and to see how visitors move around our website when they are using it. This helps us to improve the way our

Website works, for example, by ensuring that users are finding what they are looking for easily.

- *Functionality cookies*

These are used to recognise you when you return to our Website. This enables us to personalise our content for you, greet you by name and remember your preferences (for example, your choice of language or region), although these features may not be available all the time.

33. You can choose to enable or disable Cookies in your internet browser. By default, most internet browsers accept Cookies but this can be changed. For further details, please consult the help menu in your internet browser.
34. You can choose to delete Cookies at any time; however, you may lose any information that enables you to access the Website more quickly and efficiently including, but not limited to, personalisation settings.
35. It is recommended that you ensure that your internet browser is up-to-date and that you consult the help and guidance provided by the developer of your internet browser if you are unsure about adjusting your privacy settings.

General

36. You may not transfer any of your rights under this privacy policy to any other person. We may transfer our rights under this privacy policy where we reasonably believe your rights will not be affected.
37. If any court or competent authority finds that any provision of this privacy policy (or part of any provision) is invalid, illegal or unenforceable, that provision or part-provision will, to the extent required, be deemed to be deleted, and the validity and enforceability of the other provisions of this privacy policy will not be affected.
38. Unless otherwise agreed, no delay, act or omission by a party in exercising any right or remedy will be deemed a waiver of that, or any other, right or remedy.
39. This Policy will be governed by and interpreted according to the law of England and Wales. All disputes arising under the Agreement will be subject to the exclusive jurisdiction of the English and Welsh courts.

Changes to this privacy policy

40. Slim2Win reserves the right to change this privacy policy as we may deem necessary from time to time or as may be required by law. Any changes will be immediately posted on the Website and you are deemed to have accepted the terms of the privacy policy on your first use of the Website following the alterations.

Automated Decision Making

41. We sometimes use systems to make automated decisions based on your personal information. This helps us to make sure our decisions are quick, fair, efficient and correct, based on what we know. These automated decisions can affect the products, services or features we may offer you now or in the future, or the ability to use our services.
42. We may use automate decisions making in the following situations:
 - a. tailoring products and services – we may place you in groups with similar customers (segments) to study and learn about preferences and your needs, and offer more tailored experience for you;
 - b. detecting fraud - we use your personal information to help decide and detect if your account may be being used for fraud or money-laundering. If we think there is a risk of fraud, we may block or suspend the account;
 - c. opening account - when you open an account with us, we check that the product or service is relevant for you, based on what we know. We also check that you meet the conditions needed to open the account. This may include checking age, residency, nationality or financial position;
 - d. performing and analysing risk assessments connected to your bet.
43. Data protection law seeks to safeguard individuals against harm that may arise from decision-making - including profiling - that takes place without human intervention. You have the right not to be subject to a decision - including profiling - when it is based on the automated processing of your personal information and it has a legal effect or a similarly significant effect on you.
44. Please note that the right does not apply when the processing is:
 - a. necessary for entering into or for the performance of a contract with you; or
 - b. when it is authorised by law; or
 - c. when it is based on your explicit consent.

Contact Details

45. If you are not satisfied with our response or believe we are processing your personal data not in accordance with the law you can complain to the Information Commissioner's Office (ICO) by contacting them on 0303 123 1113 or visiting <https://ico.org.uk/>.
46. Our Data Protection Officer is Kayleigh Golawska and you can contact them at support@slim2win.co.uk - They will endeavour to respond within 3 working days.

