



GDPR and Data Privacy Policy

Version: 11
Owner: Luke Goodlet (CEO)
Date: 1st March 2026
Review: 28th February 2027

Introduction

Focus Fitness UK Ltd ("we," "us," or "our") is committed to protecting and respecting your personal information in full compliance with the General Data Protection Regulation (GDPR) (EU) 2016/679. We take your privacy seriously and want you to be confident that your information will be properly protected while in our possession.

Lawful Basis for Processing

Under GDPR, we are required to have a lawful basis for processing personal data. The primary lawful bases we rely upon include:

- **Consent:** Where you have given clear consent for us to process your personal data for a specific purpose.
 - **Contractual Necessity:** When processing is necessary for the performance of a contract with you.
 - **Legitimate Interests:** Where processing is necessary for our legitimate interests, provided those interests are not overridden by your data protection rights.
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Communication and Marketing Preferences

To comply with GDPR's requirements for consent, we ask learners and potential learners to "opt-out" if they do not wish to receive information about our products and courses. This ensures that you have a choice in receiving communications from us. Additionally, under GDPR, you have the right to withdraw consent at any time.

Data Sharing and Third-Party Processors

We will never sell your personal data. However, we may share it with other organizations who act as data processors to help us provide our services to you. Under GDPR Article 28, these



activities are conducted under binding contracts with strict requirements to ensure your information's confidentiality and security.

Types of Personal Data We Collect

Personal data, as defined by GDPR, means any information relating to an identified or identifiable person. We may process the following types of personal data about you, which we have grouped as follows:

- **Identity Data:** first name, last name, username or similar identifier, marital status, title, date of birth, and gender.
 - **Contact Data:** billing address, delivery address, email address, and phone numbers.
 - **Financial Data:** bank account details and payment card information.
 - **Transaction Data:** details about payments to and from you, and other details of products and services you have purchased from us.
 - **Profile Data:** username, password, purchase history, preferences, feedback, and survey responses.
 - **Usage Data:** information about how you use our websites, apps, products, and services.
 - **Marketing and Communications Data:** preferences for receiving marketing from us and third parties.
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Information from Other Organisations

We sometimes receive personal data from other organisations, such as when they refer individuals interested in our traineeships and training courses. We may also collect information from social media where you have given us permission or if you engage with our social media pages. Additionally, under GDPR Article 6, we may use other organisations to conduct research and analysis on personal data, which may result in the creation of new personal data.

Your Data Protection Rights

Under GDPR, you have the right to access, correct, delete, and restrict the processing of your personal data, as well as the right to data portability. You may also object to the processing of your data under certain conditions. To exercise any of these rights, please contact our Data Protection Officers as provided below.

Information Commissioner's Office (ICO)

We are and will remain registered with the Information Commissioner's Office and fully comply with any requirements.



Data Compliance Responsibility

We have appointed in a designated person to manage compliance responsibilities internally in accordance with GDPR to oversee privacy-related matters. If you have any questions about this privacy notice or wish to exercise your data protection rights, please contact us using the details below.

Contact Details

- **Legal Entity:** Focus Fitness UK Ltd
- **Email Address:** info@focusfitnessuk.com
- **Postal Address:** Data Compliance, Focus Fitness UK Ltd, Southbank Club, 124-130 Wandsworth Road, Vauxhall, London, SW8 2LD