

BOOSTR

PRIVACY NOTICE

This version is effective from: 26 July 2021

This Privacy Notice explains our approach to any personal data that we might collect from you or which we have obtained about you from a third party in relation to your use of:

- our website www.Boostr.App (the **Site**);
- our “Boostr” mobile apps (the **Apps** or any one of them an **App**); and
- any of the events (including the BoostR “Corporate Running World Cup” and other events), competitions and promotions and other services accessible through the Site or App (“**Events & Services**”).

In this Privacy Notice, we refer to our Site, Apps and Events & Services collectively as “Boostr”. From time to time, you may be notified that a separate privacy notice applies to a particular Site, App or Events & Services, in which case that privacy notice shall apply.

Please take a moment to read and understand this Privacy Notice. It should be read in conjunction with our [Terms of Use](#).

This policy is provided in a layered format so you can click through to the specific areas set out below.

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1. ABOUT US

Boostr Limited is the controller and is responsible for your personal data (referred to as “we”, “us” or “our” in this Privacy Notice).

We have appointed a data privacy champion who is responsible for overseeing questions in relation to this Privacy Notice. If you have any questions about this Privacy Notice, including

any requests to exercise your legal rights, please contact the data privacy champion using the details set out below.

CONTACT DETAILS

Full name of legal entity:	Boostr Limited
Title of data privacy champion:	Katharine Jackson
Email address:	Admin@Boostr.app
Postal address:	CSM Sport and Entertainment, 10a Greencoat Place, London, SW1P 1PH

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

This Privacy Notice only applies to the use of your personal data obtained by us, whether from you directly or from a third party. It does not apply to personal data collected by third parties during your communications with those third parties or your use of their products or services.

Our Site and Apps may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. Please note that these websites and any services that may be accessible through them have their own privacy notices and that we do not accept any responsibility or liability for these notices or for any personal data that may be collected through these websites or services. Please check these policies before you submit any personal data to these websites or use these services.

Boostr is not intended for children and we do not knowingly collect data relating to children.

2. DATA COLLECTED

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We collect personal information from you that we have grouped together as follows:

- **Identity Data:** first name, last name, title, date of birth, gender, Boost username and Boost password.
- **Contact Data:** work/business email address and work/business telephone number.
- **Historic Activity Data:** details of past fitness activities, types and levels.
- **Health Data:** Information on any medical or health related conditions, treatment or disabilities, where you expressly consent to us collecting such data.

- **Profile Data:** username or similar identifier, image or photograph, interests and preferences, and people in your Boost community that follow you or are followed by you.
- **Activity Data:** activity time, activity type, steps, motion, and calories.
- **Events & Services Data:** number and details of Events & Services that you have participated in, performance history (including leaderboard rank and achievements).
- **Location Data:** your device location disclosed by GPS, wireless networks, cell towers and WIFI access points.
- **Content Data:** content you share through Boost such as photos, videos, ratings and reviews.
- **Financial Data:** bank account and payment card details.
- **Transaction Data:** details about payments to and from you and details of in-App purchases.
- **Device Data:** the type of mobile device you use, a unique device identifier (for example, your Device's IMEI number, the MAC address of the Device's wireless network interface, or the mobile phone number used by the Device).
- **Usage Data:** includes details of your use of any of our Apps or your visits to any of Our Sites including, but not limited to, traffic data and other communication data, whether this is required for our own billing purposes or otherwise and the resources that you access.
- **Marketing and Communications Data:** includes your preferences in receiving marketing from us and our third parties and your communication preferences.

We also collect, use and share Aggregated Data such as statistical or demographic data for any purpose. Aggregated Data could be derived from your personal data but is not considered personal data in law as this data will not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific App feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this Privacy Notice.

3. HOW WE COLLECT YOUR PERSONAL DATA

We will collect and receive personal data using different methods:

<p>Personal data you provide to us</p>	<p>You may give us your personal data directly, for example, when you register to use the Site or App, create or update your profile, sign up for our marketing communications, register for Events & Services, make a purchase, request customer support or otherwise provide information to us.</p> <p>This information includes Identity, Contact, Historic Activity, Health</p>
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	Data (only with your explicit consent), Profile Data and Content Data.
Information we collect about you and your device	<p>When you access and use our Sites and Apps we will automatically collect personal data.</p> <p>This information includes Device, Content, Activity and Event & Services Data.</p> <p>We may collect this data using cookies and other similar technologies. Please see our cookie policy for further details.</p>
Personal data received from third parties	<p>We may receive personal data about you from third parties, including your employer or other organisation of which you are a member.</p> <p>This information includes Identity and Contact Data.</p>
Location tracking	<p>We use GPS technology to track your device location. We do not track your device location while you are not using the App. Some of our location-enabled Events & Services require location tracking for certain features to work (for example, providing route maps or route tracking). If you wish to use the particular feature, you will be asked to consent to your data being used for this purpose. You can withdraw your consent at any time by adjusting your device settings.</p> <p>This information comprises Location Data.</p>

4. HOW WE USE YOUR PERSONAL DATA

We will only use your personal data when the law allows us to do so.

We have set out below, all the ways we use your personal data, and the legal bases on which we rely to do so.

Purpose/activity	Type of data	Lawful basis for processing
To install an App and register you as a new Site or App user	Identity Data Contact Data Financial Data Device Data Health Data Historic Activity Data	Your consent (or explicit consent in the case of Health Data) Performance of a contract with you Necessary for our legitimate interests (to keep records updated and to analyse how our services are used)
Create a profile for you. Once you've registered as a new Site or App user, you will be given the opportunity to create a User Profile to participate in Events & Services, enter leaderboards and allow people in your Boost	Profile Data Activity Data Events & Services Data Content Data Health Data	Your consent Performance of a contract with you Necessary for our legitimate interests (to keep records updated and to analyse how our services are used)

community to follow you or be followed by you	Historic Activity Data	are used)
Enable you to participate in Events & Services	Profile Data Activity Data Events & Services Data Content Data	Your consent (or explicit consent in the case of Health Data) Performance of a contract with you Necessary for our legitimate interests (to keep records updated and to analyse how our services are used)
Record and analyse your activities and performance	Profile Data Activity Data Event Data Location Data	Your consent Performance of a contract with you Necessary for our legitimate interests (to keep records updated and to analyse how our services are used)
To process in-App purchases including managing payments and collecting money owed to us	Identity Data Contact Data Financial Data Transaction Data Device Data Marketing and Communications Data Location Data	Your consent Performance of a contract with you Necessary for our legitimate interests (to recover debts due to us)
To manage our relationship with you including notifying you of changes to the App or any Events & Services	Identity Data Contact Data Financial Data Profile Data Marketing and Communications Data	Your consent Performance of a contract with you Necessary for our legitimate interests (to keep records updated and to analyse how customers use our products/ Services) Necessary to comply with legal obligations (to inform you of any changes to our terms and conditions)

<p>To enable you to participate in a prize draw, competition or complete a survey</p>	<p>Identity Data Contact Data Device Data Profile Data Marketing and Communications Data</p>	<p>Your consent Performance of a contract with you Necessary for our legitimate interests (to analyse how customers use our products/Services and to develop them and grow our business)</p>
<p>To administer and protect our business and this App including troubleshooting, data analysis and system testing and to analyse, develop and improve the Boostr and our other services</p>	<p>Identity Data Contact Data Device Data</p>	<p>Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security)</p>
<p>To deliver content and advertisements to you To make recommendations to you about goods or services which may interest you To measure and analyse the effectiveness of the advertising we serve you</p>	<p>Identity Data Contact Data Device Data Content Data Profile Data Usage Data Marketing and Communications Data Location Data</p>	<p>Consent Necessary for our legitimate interests (to develop our products/Services and grow our business)</p>

SHARING PERSONAL DATA

We only share personal data with others when we are legally permitted to do so. When we share personal data with others, we put contractual arrangements and security mechanisms in place to protect the personal data shared and to comply with our data protection, confidentiality and security standards and obligations.

<p>Your employer or other organisation of which you are a member</p>	<p>We share your personal data with your employer or other organisation of which you are a member to enable them to administer your access to the Boostr and view reports about your use of Boostr. This information includes Identity, Contact, Profile, Activity and Event & Services Data.</p>
<p>Other members of your</p>	<p>We share your personal data with other members of your Boostr community to enable them to contact, interact and compete with you.</p>

Boostr community	This community comprises other Boost users from your employer or other organisation of which you are a member. This information includes Profile, Activity and Event & Services Data.
Third-party suppliers who provide applications/ functionality, data processing or IT services	We share personal data with third parties who support us in providing Boost and help provide, run and manage our internal IT systems, marketing, promotional and other activities. Such third parties may also include, for example, providers of information technology, cloud-based software-as-a-service providers, identity management, website design, hosting and management, data analysis, data back-up, security and storage services.
Payment providers and banks	We share personal data with third parties who assist us with the processing of payments and refunds.
Other third parties	We also share personal data with other companies within our group of companies, government bodies and law enforcement agencies, legal and professional advisers and successors in title to our business and related parties (including in the event that we sell, transfer or merge parts of our business or our assets). Occasionally, we may receive requests from third parties with authority to obtain disclosure of personal data, such as to check that we are complying with applicable law and regulation, to investigate an alleged crime, or to establish, exercise or defend legal rights. We will only fulfil requests for personal data where we are permitted to do so in accordance with applicable law or regulation.

INTERNATIONAL TRANSFERS

Some of our external third parties are based outside the UK so their processing of your personal data will involve a transfer of data outside the UK.

Whenever we transfer your personal data out of the UK, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data.
- Where we use certain service providers, we may use specific contracts approved by the UK which give personal data the same protection it has in the UK.

DATA SECURITY

We take the security of your personal data very seriously, and have controls and processes to minimise the risk of a data breach occurring, though you must take responsibility when visiting other websites, even if following a link to them from our Site or Apps. CSM is ISO 20071 certified.

We have put in place procedures to deal with any suspected or actual personal data breach and will notify you or the appropriate regulator where we are legally required to do so, and we will make all efforts to minimise the impact.

COOKIES

We use cookies and/or other tracking technologies to distinguish you from other users of the Apps or Site and to remember your preferences. This helps us to provide you with a good experience when you use our Apps or Site and also allows us to improve the Apps and Site. For detailed information on the cookies we use, the purposes for which we use them and how you can exercise your choices regarding our use of your cookies, see our [cookie policy](#).

DATA RETENTION

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

YOUR LEGAL RIGHTS

Under certain circumstances, you have rights under data protection laws in relation to your personal data such as:

- Requesting access to your personal data;
- Requesting a correction to your personal data;
- Requesting erasure of your personal data;
- Objecting to the processing of your personal data;
- Requesting a restriction on the processing of your personal data;
- Requesting a transfer of your personal data; and/or
- Your right to withdraw your consent.

If you wish to exercise any of these rights please email us at Admin@Boostr.app.