



WHITE BULL CROSSFIT - PRIVACY POLICY

White Bull Crossfit ("Holifit Bros Srl") is registered in Belgium under number 1004524971 ("**we**", "**our**" and "**us**") are committed to protecting and respecting your privacy. This policy explains how we collect and process any personal data that you provide to us or that we have received from a third party source.

References in this notice to "**data protection law**" means all applicable data protection and privacy legislation in force from time to time in Belgium the EU including the [The Act of 30 July 2018](#) on the protection of natural persons with regard to the processing of personal data ("**the Act**"), Europe's [General Data Protection Regulation \(GDPR\)](#) ((EU) 2016/679) and the Privacy and Electronic Communications Regulations 2003 (SI 2003/2426).

References in this notice to "**sensitive personal data**" and "**personal information**" shall have the same meaning as "**special categories of data**" and "**personal data**", respectively, under data protection law. References to "**information**" shall also include "**sensitive personal data**", where applicable.

1 OUR DETAILS

We are the data controller with conduct of your personal information.

Our Data Protection Officer (DPO) is Johanan Tang.

You can contact us by post at: Rue d'Idalie 9-13, Ixelles 1050, Belgium.

You can also contact us by email at: info@whitebullcrossfit.com.

2 HOW WE USE YOUR PERSONAL INFORMATION

This part of the policy explains what information we hold about you, why we are processing that information, the legal basis for processing, the duration for which we keep your information and (if applicable) who your information will be shared with and where those recipients are based.

The following table explains how we use your personal information in our business. Different sections apply depending on your relationship to us. Please read each section carefully as more than one section may apply to how we use your information.

Scenario	Categories of personal data we process	Lawful basis
1. Visitors to our website		
You submit information to us through our website contact form.	Name and email address.	We rely on your consent within the contact form. If you are contacting us so that we can provide you with information about our services then we process your personal information as potential interest party.

<p>You agree to the use of cookies on our website.</p>	<p>IP address, approximate location, technical information relating to your device and browser.</p>	<p>We process the information we collect from those cookies based on our legitimate interest in monitoring how our website users interact with our site and services and using that information to improve our website and business.</p>
<p>2. Attendees to our Crossfit training sessions (WODs), open gym, seminars and events</p>		
<p>You are one of our members and while creating your profile on our booking app Resawod, accepted and signed our Terms and Conditions</p>	<p>Name and email address, dob, phone number</p>	<p>We have a legitimate interest in:</p> <ul style="list-style-type: none"> • conducting administrative and operational processes within our business, including keeping a record of past and current attendees and members or companies we host, keeping records of correspondence with attendees and their organisations.
<p>You, or somebody acting on your behalf, make a booking with us for a coaching session, training session, seminar, or event (corporate or personal).</p>	<p>Name and email address, phone number, in some instances job description or role and company</p>	<p>We have a legitimate interest in:</p> <ul style="list-style-type: none"> • conducting administrative and operational processes within our business, including keeping a record of past and current attendees and members or companies we host, keeping records of correspondence with attendees and their organisations. <p>If you or your company are paying to attend then the processing is necessary for the performance of the contract between you and us for the provision of a service.</p>
<p>You attend an event which is being recorded. (Please note: we may occasionally record workout sessions, seminars, events and, if attending, there is a possibility that you may feature in the recording. We will inform you in advance if we are</p>	<p>Your likeness, your name, details of any comments you make during the recorded session.</p>	<p>We have a legitimate interest in recording our events for internal review and for republication or sharing as part of our social media marketing presence.</p>

recording the event and you will be given the opportunity to exclude yourself.)		
You provide us with details of your dietary requirements, accessibility requirements or any other medical information so that we can accommodate you at our event.	Health and medical information, information about your religion.	We process this information based on your explicit consent.
3. Suppliers, contractors and their employees / representatives		
You or your organisation supplies or offers to supply goods or services to us.	Name, contact information, payment details, details of staff involved in delivery of goods/services.	<p>This processing is necessary for us to perform our contract with you. Otherwise, if the contract is with your organisation, then we have a legitimate interest in processing your personal information for the purpose of managing the contractual relationship between your organisation and us. In each case, this includes taking pre-contractual steps such as obtaining a fee quote from you.</p> <p>We have a legitimate interest in keeping a record of the contract between us (or your organisation and us) for the administration of our business and to address any disputes which may arise between us.</p>
4. Marketing for visitors to our website, individuals (including former members, and employees, officers or representatives of our suppliers) and prospective members, and attendees to our CrossFit training sessions, seminars and events		
You submit information to us through our website contact form, attend one of our seminars or CrossFit training events or are a prospective, current or former member.	Name and email address	<p>If you have asked us to send you marketing communications then we do so based on your consent.</p> <p>In other circumstances we may send you marketing communications about</p>

		<p>services which are identical or similar to those which you have received from us. This is known as the soft opt-in. In this situation we have a legitimate interest in keeping you informed about our services.</p>
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3 HOW LONG WE KEEP YOUR INFORMATION FOR

We only keep your information for so long as is reasonably necessary. The retention period will vary depending on the nature of the purpose for which the personal data is held.

Upon expiry of the applicable retention period we will either:

- take appropriate steps to return any original documentation submitted by you to us containing your personal information to you; and/or
- securely destroy your personal data in accordance with applicable laws and regulations; or
- anonymise your personal data so that you can no longer be identified from it.

4 WHO IS YOUR INFORMATION SHARED WITH?

We share your personal information with third parties only where we are required to do so to comply with the law, to protect our rights, to perform our contractual obligations or to efficiently operate our business. In order to achieve these purposes, we share your data with the following people or groups of people:

- our external contractors and service providers. This includes software providers, marketing consultants and IT support providers ((eg Resawod). Our external contractors and service providers are subject to strict contractual obligations to treat your personal information with the utmost sensitivity, to keep it confidential and to comply with data protection law at all times;
- our professional advisers, including our accountants (details for which can be found in our accounts). These third parties are subject to professional duties of confidentiality;
- regulatory and government bodies, where we have a legal obligation to do so. These organisations have a legal duty to protect your information;
- in litigation, to the Court, which is subject to its own legal duty to maintain the confidentiality and security of your personal information, and to counsel, who is subject to a professional duty of confidentiality;
- voluntary accreditation bodies. These organisations have a contractual duty to protect your information; and
- any other person who you instruct us to share your personal information with or with whom we may reasonably be expected to share it with in order to deal with your enquiry.

If you are a member of ours (including former members, officers or representatives of an organisation which is a client of ours) we will also share your data with the following people or groups of people:

- if you are raising a complaint with the company, the complaint will be shared with our insurers and insurance brokers, our lawyers and the legal ombudsman (in anonymised form);
- where you have given us permission to use any comments for testimonial and marketing purposes, your name and picture may be shared on our website and other marketing material or social media.

If the recipient of your information is based outside of Belgium or EU and is not based in a country which offers equivalent protections for personal data then your data will be safeguarded by the use of standard

contract clauses in conjunction with an international data transfer addendum where applicable which each party will sign, or other appropriate safeguards permitted by data protection law.

5 YOUR RIGHTS

Under Belgian and EU data protection law you have the following rights:

- The right to be informed about what we do with your information. This Policy provides you with this information. Please note that, as set out in the above section 4, in certain circumstances we are legally obliged not to disclose certain processing information to you.
- If we are processing your data on the basis of your consent then you have the right to withdraw that consent at any time. Consent can be withdrawn:
 - by notifying us using the details set out at the start of this policy;
 - in respect of marketing communications, by following the steps outlined in that communication, such as clicking the 'unsubscribe' link in the marketing emails we send; or
 - by speaking to one of the owners,please note that the lawfulness of our historic processing based on your consent will not be retrospectively affected by your withdrawal of consent. Furthermore, we may have a legal obligation or right to retain your information on our files notwithstanding that you have withdrawn your consent to our processing. Should this be the case, we will notify you around the time we acknowledge your withdrawal of consent.
- The right to access a copy of your information which we hold. This is called a 'data subject access request'. Additional details on how to exercise this right are set out in section 7 (*Access to Information*) below.
- The right to prevent us processing your information for direct marketing purposes. We will usually inform you (before collecting your data) if we intend to use your data for such purposes or if we intend to disclose your information to any third party for such purposes. You can exercise your right to prevent such processing by contacting us using the details set out at the start of this policy.
- The right to object to decisions being made about you by automated means. We will inform you if your information is subject to automated processing.
- The right to object to us processing your personal information in certain other situations.
- The right, in certain circumstances, to have your information rectified, blocked, erased or destroyed if it is inaccurate.
- The right, in certain circumstances, to claim compensation for damages caused by us breaching data protection law.
- The right, in certain circumstances, to request that we erase, rectify, cease processing and/or delete your information.
- The right, in certain circumstances, to request the information we hold on you in a machine readable format so that you can transfer it to other services.

You have the general right to complain to us in the first instance if you are not happy with how we are processing your personal information. If you are not satisfied by our response then you can complain to your local data protection regulator.

6 ACCESS TO INFORMATION

Under Belgian and EU data protection law you can exercise your right of access by making a written request to receive copies of some of the information we hold on you. You must send us proof of your identity, or proof of authority if making the request on behalf of someone else, before we can supply the information to you. Requests should be sent to us using the contact details set out at the start of this policy.

You do not need to pay a fee to exercise this right unless you are requesting copies of documents you already possess, in which case we may charge our reasonable administrative costs. We are also allowed to charge you for our reasonable administrative costs in collating and providing you with details of the requested information which we hold about you if your request is clearly unfounded or excessive.

In certain circumstances, you are entitled to receive the information in a structured, commonly used and machine-readable form.

7 CHANGES TO OUR PRIVACY POLICY

This notice was last updated in March 2024. Any material changes we may make to our privacy notice in the future will be uploaded to our website and if the change is significant then we will tell you about it by email or via another appropriate means of notification.