

# Privacy Policy

## 1. Introduction

This is Bulletproof Culture Ltd's Privacy Notice. Bulletproof Culture ("We") is committed to protecting personal data of its Users and all those individuals in respect to whom personal data has been collected ("Data Subjects").

This Privacy Notice is for Bulletproof Culture website [www.bulletproofculture.com](http://www.bulletproofculture.com) (the "Website") and it provides data users with the necessary information relating to how data is collected, the storage and processing of any data inputted through the Website.

Data is collected and processed in accordance to the General Data Protection Regulation ("GDPR"), the Data Protection Act 2001 (the "Act") and other subsidiary legislation.

### 1.1 Definitions

"Bulletproof"/"We" means the company Bulletproof Culture of 18, ix-Xemxija, Triq l-Ispiera, Swieqi, bearing registration number C 96634;

"Membership" means the membership subscription of the Gyms or other facilities advertising their services on the Bulletproof Website;

"Services" means the ability for Users to purchase membership subscriptions of Fitness Facilities, purchasing of products, and events;

"User"/"You" means any individual visiting the Website;

"Website" means the Bulletproof Culture website.

## 2. Data Controller

The Data Controller of this Website is Bulletproof Culture Limited which is a company registered under Maltese law bearing registration number C 96634.

Any queries or comments may be forwarded to [info@bulletproofculture.com](mailto:info@bulletproofculture.com)

## 3. Lawful Purposes

The Data we collect from this Website is collected either by means of consent, to meet our contractual and/or legal obligations in carrying out our Services, or to fulfil other legitimate interests.

Wherever Your consent is required to collect and process data, we will store and keep evidence of such opt-in consent. Moreover, any consent given by you may be revoked through clearly available options to opt-out.

You may withdraw such consent at any time by emailing us at <[info@bulletproofculture.com](mailto:info@bulletproofculture.com)>. Once you withdraw your consent, we will stop processing your personal data unless we have another legal basis to process such data.

#### **4. When and how Bulletproof collects data**

From the moment you access the website, Bulletproof collects data. Data can be collected in two ways; either by You as the user providing the data yourself, or else data is collected automatically.

We collect your personal data when you;

- Create an account with us;
- Purchase membership or any of our services, events and/or products from the Website;
- Sign up to our newsletters and/or promotional and marketing emails;
- Take part in a competition or survey;
- Email us or contact us in any way.

The User may opt out of receiving newsletters, promotional and/or marketing material through the email by clicking on the 'unsubscribe' button.

Unless the Users opt-in to newsletters and marketing material, Bulletproof will only send information relating to the membership purchased through the Website.

In the case of purchasing of memberships, your personal details will be shared with the Fitness Facility with whom you purchase a membership. The Data transferred will not include bank details or any other details which the Fitness Facility does not require.

Your personal data will not be sold or transferred to third parties without your consent, unless in those cases established by the law. If your personal data is to be disclosed to third parties, you will be informed that such data will be disclosed. Prior to this transferring of data, Bulletproof will ascertain that such third parties are well-equipped to treat your personal data in accordance with the law.

#### **5. What Data is collected?**

We limit the collection of data only to what is necessary for us in relation to the purposes of collection. Therefore, we strive to only collect the data which Bulletproof requires in its fulfilment of obligations.

We categorise data as follows;

Contact Details when creating an account: Name and surname, email address, date of birth, (fitness experience), gender, mobile number.

Membership details: Name and surname, address, email address, date of birth, gender, whether you are a student, whether you work, joint-membership option, banking details, details of an emergency contact,

Use of Website details: Your URL clickstreams, IP address, type of device, operation system.

#### **6. Is sensitive data collected?**

No, Bulletproof does not collect any "sensitive data" about its Users (such as racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union memberships, genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or

data concerning a natural person's sex life or sexual orientation). When we do, we only collect this kind of data with your explicit consent.

## **7. Cookies Policy**

The website uses cookies during your session on our website which are essential for the website to be functional. The cookies are stored in temporary memory.

The secondary reason for cookies is set by third party Google analytics, and their privacy policy may be accessed here; [https://policies.google.com/privacy?hl=en\\_GB](https://policies.google.com/privacy?hl=en_GB)

## **8. Your Rights**

You have various rights in relation to personal data. You may exercise these rights by sending us an email on [info@bulletproofculture.com](mailto:info@bulletproofculture.com).

You have a right to obtain confirmation that we are processing your data, and you also have a right to request a copy of all the personal data we have.

You have a right to make us correct any inaccurate personal data about you, including the updating or correcting of any such data.

You may also object to any processing of your data, and you have a right to lodge a complaint regarding the use of your data. Kindly contact us first, in order for us to address your query. Further complaints may be addressed to the Office of the Information and Data Protection Commissioner by accessing their contact details on their website, at <https://idpc.org.mt/>.

You have the right to be forgotten by us, by asking us to erase any personal data we hold about you. However, please note that this is not an absolute right – we might still process data for purposes of your use of the Website, since we may be justified to keep data in order to comply with legal obligations.

## **9. Third Parties**

Bulletproof uses third parties to facilitate its services and also directly works and offers its services with third parties. Therefore, your data may be shared with third parties in order for us to fulfil our obligations at law, our contractual obligations, and to perform our services.

Personal data is only shared where strictly necessary. When personal data is shared, we will take steps to ensure that your personal data is protected to the requirements set at law.

Particularly, when you subscribe to one of the Memberships, your personal data which you provide in the application form will be transferred to that respective Fitness Facility. Kindly refer to the Privacy Policy of that particular Fitness Facility for information on how they store and process your personal data.

Your data may also be transferred to Government authorities as requested of us by law.

Other third parties include our Server providers, receipts issuer and our payment gateway.

We do not generally transfer your personal data outside the European Union (EU).

## **10. How long do we keep your personal data for?**

We keep and store personal data for as long as necessary to fulfil the purposes for which it was collected, including for the purposes of satisfying any legal or reporting requirements. Certain data is retained for as long as is required by law.

The retention period of data relating to how you use our website, namely IP address, type of device and operating system, URL clickstreams and from which account you access our website are retained for 90 days, for troubleshooting purposes only.

#### **11. Changes in this Privacy Policy**

Bulletproof changes this policy from time to time in order to reflect the current data processing carried out by the website. We will always keep this Policy up to date in case of changes, and it is therefore in your interest to check this Policy from time to time.