

Privacy Notice

Last updated April 29, 2020

Reset Your Gut is dedicated to protecting the privacy of those who visit our Website and use our Internet Products. This Privacy Policy explains how we collect your Personal Data on our Website (www.ryghealth.com) or through our Internet Products, how we protect such data, and the rights you have concerning the use of such data. Please read this Privacy Policy carefully.

Who we are

This Privacy Policy applies to our website (www.ryghealth.com) (“Website”) as well as to our products, offerings, features, tools or resources offered via our Website (collectively, our “Internet Products”). The controller of your Personal Data collected via our Internet Products according to Art. 4(7) GDPR is Reset Your Gut, The Mill House, Turville, Henley-on-Thames, RG9, 6QL

If you have any requests concerning your personal information or any queries with regard to these practices, please contact our Data Controller Catherine Rogers at info@ryghealth.com. Please note that all data captured will be used and held in accordance with the requirements of the Data Protection Act 1998 and the new regulations from the 25th May 2018.

What data about me is collected and how is it used?

Personal Data is information that identifies you or can be used to identify or contact you. Such Personal Data may include your name, address, email address, telephone number, birth date (primarily for eligibility purposes) and billing and credit card information. Personal Data may also include health related data.

We collect Personal Data from you when you use our Website or subscribe to our Internet Products, as further described in this Privacy Policy. In all of these cases, we will only process Personal Data that you provide directly to us or which we automatically collect from you as specified in this Privacy Policy. Unless defined in this Privacy Policy or unless you give us permission to do so, we will not use or share your Personal Data other than as specified in this Privacy Policy.

How we collect and use your personal data

In the following section, you will find information on how we collect your Personal Data, for which purposes we process your data and on which legal basis we do so. To the extent the legal basis of our processing of your data are our legitimate interests, you can contact us at the contact details below if you require more details on our legitimate interests. If we use your consent as the legal basis of our processing of your Personal Data, you have the right to revoke your consent at any time with future effect as described in the following or by

contacting us at the contact details below. This will not affect the processing of your Personal Data being undertaken until the revocation. The same applies if we refer to your consent or our legitimate interests in other parts of this Privacy Policy.

- If you use our Internet Products

We collect information, some of which contains Personal Data, that you provide directly to us when you choose to use our Internet Products (available on a subscription basis) such as when you select your 'Meal Plan'. We also collect data that you provide directly to us through responses to special Internet Products such as surveys, questionnaires, self-assessment quizzes, contests and the like. We use this data to personalise our Internet Products and to optimize your customer experience when using our Website.

Moreover, we automatically collect information including Personal Data when you browse our Website or use our Internet Products, such as your IP address, browser type, operating system, error logs, and other similar information. Such aggregated information does not allow us to identify you and is used by us to analyse trends, to administer the Website, to monitor our Website's use, and to gather general information about the use of our Website.

The legal basis for such processing of your Personal Data are our legitimate interests (Art. 6(1)(f) GDPR) in customizing the content of our services in line with user preferences and in further improving our Internet Products.

Some of our Internet Products require the processing of your health related data, like information on your food intolerances. We will only process such data with your prior consent according to Art. 9(2)(a) GDPR, except where permitted or required by applicable law.

Please note that you are not legally required to provide us with your Personal Data. However, without your Personal Data we will not be able to provide you with the full range of our Internet Products.

- If you become a subscriber

In order to access certain Internet Products on our Website, such as our recipes, you must first complete certain steps to become a subscriber. During these steps, you will be required to provide us with Personal Data such as your name, postcode and email address, and, if you subscribe to one of our Internet Products, credit card and billing information as well as for certain Internet Products health-related information. This data is used to provide you with the requested Internet Products or for subscription billing purposes.

Such processing of your Personal Data is necessary for the performance of our services. The legal basis for such processing of your Personal Data is therefore Art. 6(1)(b) GDPR. As regards health-related information, we will only process such data with your prior consent according to Art. 9(2)(a) GDPR, except where permitted or required by applicable law. You are contractually required to provide us with such information and without such information we are not able to perform the services as described above.

- If we send you service updates

We use your Personal Data to send you important service announcements and up-dates regarding our Website or Internet Products or, if you are a subscriber, about your billing account status. When you subscribe to our Internet Products, we will send emails to provide transactional information about your subscription or to verify your username and password. Such service announcements and updates contain important information relevant to your use of our Website and/or our Internet Products.

The processing of your Personal Data for such purposes is necessary for the performance of our services. The legal basis for such processing of your Personal Data is therefore Art. 6(1)(b) GDPR. Please note that you are contractually required to provide us with such Personal Data and that without such Personal Data we will not be able to send you service-related communication.

- If you contact our customer service

If you contact our customer service, we will communicate with you in response to your inquiries, to provide the services you request, and to manage your subscription. We will communicate with you by email or telephone, in accordance with your preferences.

Such processing of your Personal Data is necessary for the performance of our services; the legal basis for such processing of your Personal Data is therefore Art. 6(1)(b) GDPR. Please note that you are contractually required to provide us with such Personal Data and that without such Personal Data we will not be able to send you customer service related communications.

- If you subscribe to newsletters and other marketing communications

When subscribing to our Internet Products or elsewhere on our Website you have the option to consent to receiving newsletters and other information on our products and services. If you “opt-in” we will send you promotional newsletters and inform you about offers, events and surveys via e-mail and through social media platforms. The legal basis for such processing of your data is your consent (Art. 6(1)(a) GDPR) or – if you are an existing customer or subscriber – our legitimate interest (Art. 6(1)(f) GDPR) in providing you with relevant marketing information. Please note that you are not legally required to provide us with your Personal Data. However, without your Personal Data we will not be able to send you our newsletters and other information as described above. You have the option to opt-out of these types of communication at any time by following the respective instructions in such communication.

- If you use our social features

Our Website features public forums such as message boards, bulletin boards, recipe swaps or similar activities where you and other users of our Website can communicate with one another. In addition, we offer the “Public Profile” feature of our Website to permit you to share information about yourself (including, if you elect, Personal Data) with others (together “Social Features”).

If you use these Social Features, please be aware that we cannot control how other users of our Website might use your data. We also cannot prevent you receiving un-wanted messages from other users. If you wish that a specific content generated by you shall be removed from the Social Features on our Website, please contact us at the contact details as mentioned below.

Any Personal Data posted via the Social Features are processed in order to provide you with the respective service and the legal basis is therefore Art. 6(1)(b) GDPR. Please note that you are not legally required to provide us with your Personal Data, but that you will not be able to use our Social Features without providing your data.

Cookies

We use cookies and similar technologies like pixels, tags, web beacons, and other identifiers to help us personalise our Website and Internet Products for you, remember your preferences, understand how users are using our Website and Internet Products and help customise our marketing communication.

A cookie is a small data file containing a string of characters that is sent to your computer when you visit a website. When you visit the website again, the cookie allows that site to recognise your browser. The length of time a cookie will stay on your computer or mobile device depends on whether it is a "persistent" or "session" cookie. Our Website uses both types of cookies. Session cookies will only stay on your device until you stop browsing. Persistent cookies stay on your computer or mobile device until they expire or are deleted.

We use the following types of cookies on our website:

- Strictly necessary cookies: These cookies are essential for you to use our Website and our Internet Products.
- Performance cookies: These cookies collect information about how you use our Website. We use such data to help optimise our Website and make it easier for you to navigate and use our Internet Products.
- Functional cookies: These cookies allow our Website and Internet Products to remember the choices you make using our Website and personalise your experience.
- Third Party cookies: Third party cookies are those placed by websites and/or parties other than us. These cookies are used on our Website to improve our Internet Products or to help us provide more relevant advertising. These cookies are subject to the respective privacy policies of the external service providers placing the cookies on your browser. Visit www.youronlinechoices.eu to learn more about your options and how to opt-out of such third party cookies.

- Analytics cookies: We use analytics cookies to help us understand how users browse our Website and how they arrived at our Website. We use a variety of website analytics providers such as Google Analytics. These cookies are subject to the respective privacy policies of the external service providers and to learn more about your options and how to opt-out of such analytics cookies visit the respective providers website for details.

How we share and disclose personal data

We will not share, sell, transfer or otherwise disseminate your Personal Data to third parties, unless required by law according to Art. 6(1)(c) GDPR, unless required for the purpose of your contract according to Art. 6(1)(b) GDPR, unless the third party acts as a data processor on our behalf according to Art. 28 GDPR or you have given us express consent to do so according to Art. 6(1)(a) GDPR.

We also use third-party service providers to offer or facilitate services on our behalf and share your Personal Data with such providers to the extent necessary for such providers to perform their services on our behalf. In particular, we use a mailing company to dispatch email marketing messages, payment service providers to bill you for goods and services and for credit card processing, specialist providers for payment collection and fraud screening, social media and other agencies to manage our social media and other advertising campaigns.

Some of the companies we share your Personal Data with as described above are located outside of the European Economic Area.

In order to grant sufficient protection of your Personal Data in this context, we use standard data protection clauses adopted by the European Commission according to Art. 46(2)(c) GDPR with such companies or certifications of such companies under the EU-U.S. Privacy Shield according to Art. 45(1) GDPR. You can request further details by contacting us at the contact details as mentioned below.

Any sharing of your Personal Data with other service providers will be made in accordance with applicable data protection laws and will be limited to the extent necessary. We have carefully selected these companies and continuously monitor their compliance with our instructions. These companies are contractually prohibited from using your Personal Data for any other purposes than those described in this Privacy Policy. The legal basis for our sharing of your Personal Data with such companies is Art. 28(1) GDPR or alternatively our legitimate interests in commissioning those companies with the services described above (Art. 6(1)(f) GDPR).

We may also be required to disclose your Personal Data to government or law enforcement officials in response to a lawful request by a public authority or if we have to do so to comply with a legal obligation, including to meet national security or law enforcement requirements according to Art. 6(1)(c) GDPR. We can also disclose your information in order to pursue our legitimate interest in applying or enforcing our terms and conditions or in responding to any claims, in protecting our rights or the rights of a third party, in protecting

the safety of any person or in preventing any illegal activity (including for the purposes of fraud protection and credit risk reduction) according to Art. 6(1)(f) GDPR.

If required under applicable data protection laws, we will collect your prior consent before sharing your Personal Data with other companies. In such cases, the legal basis is Art. 6(1)(a) GDPR.

Is my personal data used for any other purposes?

Except as otherwise described in this Privacy Policy, we will only use Personal Data for the purposes described above or as otherwise disclosed at the time we request such data from you. Should your Personal Data be processed for other purposes than those outlined in this Privacy Policy or other purposes than the ones your Personal Data has originally been collected for, we will provide you with information on that other purpose and any other relevant information as referred to in this Privacy Policy.

What rights do I have?

You have the following rights:

- **Right of access (Art. 15 GDPR):**

You have the right to request confirmation as to whether we process your Personal Data and where that is the case, to request access to the Personal Data we hold about you.

- **Right to rectification (Art. 16 GDPR):**

You have the right to request the correction of inaccurate Personal Data.

- **Right to erasure (Art. 17 GDPR):**

You have the right to request erasure of Personal Data without undue delay under certain circumstances, e.g. if your Personal Data is no longer necessary for the purposes for which it was collected or if you withdraw consent on which our processing is based according to Art. 6(1)(a) GDPR and where there is no other legal ground for processing.

- **Right to restriction of processing (Art. 18 GDPR):**

You have the right to request us to restrict the processing of your Personal Data under certain circumstances, e.g. if you think that the Personal Data we process about you is incorrect or unlawful.

- **Right to data portability (Art. 20 GDPR):**

Under certain circumstances, you have the right to receive your Personal Data you have provided us with, in a structured, commonly used and machine-readable format and you

have the right to transmit that information to another controller without hindrance or ask us to do so.

- **Right to object (Art. 21 GDPR):**

You have the right to object to the processing of your Personal Data under certain circumstances, in particular if we process your Personal Data on the legal basis of legitimate interests (Art. 6(1)(f) GDPR) or if we use your Personal Data for marketing purposes.

You can assert your abovementioned rights by contacting us at the contact details mentioned below.

Right to lodge a complaint before the data protection authority

You have the right to lodge a complaint with a supervisory authority, in particular in the EU Member State of your habitual residence, place of work or place of the alleged infringement if you consider that our processing of your Personal Data infringes the applicable data protection laws. Please contact us at the contact details mentioned below and we will assist you to identify the respective competent supervisory authority.

Data retention

We store your Personal Data and other information for as long as necessary to enable you to use our Website and our Internet Products, to provide our services to you, to comply with applicable laws (including those regarding document retention), to resolve disputes with any parties and otherwise as necessary to allow us to conduct our business. If you have a question about a specific retention period for certain types of Personal Data we process about you, please contact us at the contact details mentioned below.

Automated individual decision-making

We do not use your Personal Data to make decisions with legal or similar effects for you based on the automated processing of your Personal Data only.

Who do I contact if I have any privacy questions?

If you have any questions about our Privacy Policy or feel that we are not abiding by the terms of our posted Privacy Policy or the applicable data protection laws, please contact our Data Controller at info@ryghealth.com

Changes to this privacy policy

We may amend this Privacy Policy from time to time. We will post any changes to this Privacy Policy here. Please refer back to this Privacy Policy on a regular basis.