PRIVACY POLICY

THE NICK (STAFFORDSHIRE) LTD

Registered in England, # 13477441

Our commitment to you:

1. We only use your data to improve your GYM experience with The Nick
2. You choose what and how we speak to you
3. Your Data is protected 24/7

How we use your Data:

We are committed to protecting your privacy. It is important that you understand how we look after your personal data and how we make sure that we meet our legal obligations to you under the data protection rules and regulations in the relevant territory (including associated guidance) (the "**Data Protection Laws**"). This privacy policy outlines how THE NICK (Staffordshire) will collect, use, store and share your personal data.

If you have any questions in relation to this policy or generally how your personal data is processed by us, please contact our customer care team by letter addressed to: **The Nick, The Old Police Station, Merrial Street Newcastle under Lyme. ST5 2AE** by email at info@thenick.co.uk or by phone on 01782 645170.

What Information do we collect about you?

If you have an account with us or make a purchase online with us, or respond to a survey with us, we collect your name and contact details (including your address, telephone number, details about your order, andyour billing information (where you are purchasing products)).

We also collect details of your interactions with us through our customer contact centres, in GYM, online or via our apps. For example, when you telephone one of our contact centres, we collect notes of our conversations with you and details of your query and from time to time we may record your calls for training and monitoring purposes. We also collect information about the purchases that you make, your saved items, your payment information, any complaints and comments that you make and your shopping preferences. We also collect CCTV images in all of our GYM's.

Each time you visit one of our websites, we will also automatically collect information and personal data about your computer for system administration including, where available, your IP address, operating system and browser type. We do this to help us analyse how users use the websites (including behaviour patterns and the tracking of visits across multiple devices), to establish more about our website users and to assist us in managing your account and improving your online experience. We also collect information about your activities on our websites, for example what device you are using and what products you're looking at.

Please note that, from time to time, we will combine personal data that we receive from other sources with personal data you give to us and personal data we collect about you.

Where do we get this information from?

We collect some of your information directly from you, either through information that you give to us or information that we collect during your visits to our websites, stores, or through your communications with us.

Information that you give us:

You may share personal data about yourself with us by:

- filling in forms on our websites, including when you purchase products online, submit queries to us, create an account on oneof our websites and/or sign up to receive promotional materialand newsletters;
- responding to a survey or entering a competition with us;
- giving us information about yourself in any communication with us, either by telephone, e-mail, post or otherwise, either in connection with your account, purchases, or to report a complaint or issue.

You are not obliged to provide your personal data to us. However, if you do not provide your personal data to us, we may not be able to fulfil yourorder or provide other services to you or respond to your queries.

Why do we need your information?

The main purpose for which we use your information is to provide you with the products that you purchase from us and to send you offers and promotions that you might be interested in.

In particular, we use your information:

- to provide you with the products that you have purchased from us and any receipts of purchase, including to deliver
- your products, and to send you order status updates;
- to take payments for the products that you have purchased and to give refunds or exchanges;to provide customer service and support to you;
- to develop and improve our products and services;
- to develop and improve our websites and set default options for you (such as language and currency) and to ensure that content is presented in the most effective manner;
- to provide you with information that you request from us or which we feel may interest you. We may send you marketing information by email, SMS or post. This can include information about new products and offers that youmay find interesting;
- to research our customers' preferences and trending products;to run surveys and competitions;
- to notify you about changes to our products;

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- as part of our efforts to keep our stores safe and secure (for example through the use of CCTV in our stores);to prevent and detect fraud and crime (for example, through the use of CCTV in our stores).

Basis for using your information

Compliance with legal obligations

As a company there are certain laws we need to comply with. In particular, we will need to process your personal information to verify your identity and for fraud and crime prevention purposes. Failure to provide the requisite personal information on sign-up / as you use our websites, may mean we cannot provide our products to you, as to allow you to purchase our products may mean we may be in breach of our legal obligations. You will not be able to object to processing or ask for the deletion of your personal information insofar as it falls under this category.

Legitimate business interests

We use your personal data as set out in this privacy policy for the legitimate interests of our business to enable us to:

- provide you with products as requested by you;
- carry out research to understand our customers and how they purchase and use our products;
- develop and improve our products.

As indicated below, we will also pass your personal data to members of the JD Group and other third parties and this is also for our legitimate business interests.

We are required to carry out a balancing test of our legitimate business interests in using your personal data outlined above against your interests and rights under the Data Protection Laws and regulations in the relevant territory. As a result of our balancing test, which is detailed below, we have determined, acting reasonably and considering the circumstances, that we are able to process your personal data in accordance with the Data Protection Laws on the basisthat we have a legitimate business interest.

Legitimate interest

We have a legitimate interest in processing your information as:

- we both benefit from the effective management of youraccount(s) (where applicable);
- we both benefit from the effective management,operation and administration of our websites;
- we both benefit from the provision of products, servicesand support and from improvements to our services;
- we both benefit from updates to our websites;
- we will both benefit from the ability to enforce or apply rights under any contract between us;
- we are required to ensure the health and safety of our customers and the security of our stored data and have alegitimate interest in ensuring any processes relating to the same are effective and that fraud and other crimes areprevented and detected;
- we would be unable to provide our products and services without processing your

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information; and we have a legitimate interest in processing your information in connection with any mergers, acquisitionsor reorganisation of our business, in which case some of your information may be shared with a prospective buyeror otherwise but only so far as is strictly necessary for thepurposes of such sale or administration.

Necessity

We consider that it is reasonable for us to process your personal data for the purposes of our legitimate interests outlined above as we process your personal data only so far as is necessary to achieve the purpose outlined in this privacy policy.

Impact of processing

We consider that it is reasonable for us to process your personal data for the purposes of our legitimate interests outlined above as the processing of your personal data does not unreasonably intrude on your privacy.

Consent

As set out above, we will send you marketing communications where you have not told us that you wish to unsubscribe and where you have purchased similar products and/ or services from the same brand or legal entity (as set out in thetable above). You will also receive marketing communications from us where you have signed up, or otherwise consented, to receive marketing messages from a brand or entity within The Nick (Staffordshire) Ltd.

You have the right to withdraw your consent to processing of this nature at any time by contacting our customer care team using the details at the start of this privacy policy.

Who do we share your information with?

We do not, and will not, sell any of your information to any third party, including your name, address, email address or credit card information.

We may disclose your information to other companies in connection with any merger, acquisition, insolvency situation or otherwise, in which case we will only disclose your information so far as is necessary.

We may also need to disclose personal data to third parties to comply with a legal or regulatory obligation, or if necessary for legal proceedings.

Where is your information stored and how long do we keep it for?

Transfers outside of the European Economic Area

The information which we collect about you may be transferred outside the European Economic Area. In the event of such transfer, we will ensure the adequate standard of security is in place for example by incorporating the European Commission approved clauses into our agreements with such third parties to ensure the security of your personal data. A copy of the European Commission approved model clauses is available here: http://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32010D0087&from=en

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Retention of your personal data

We will only keep your information for as long as is necessary to carry out the purposes we collected it for, as set out in this privacy policy (unless a longer retention period is required by the applicable law). We typically keep your personal data for 6 years from the purchase in order to enable us to deal with any issues or concerns you may have about the products or services you have received, and to allow us to bring or defend legal proceedings. In some circumstances, some of your data will be deleted in much shorter timescales, for example:

- cookies are deleted in accordance with our cookies policy
- CCTV images are kept for 60 days;
- marketing consents will be refreshed/deleted after 4 years, however, our aim is only to market to you for as long aswe believe you want to continue hearing from us based on how you interact with us.

If reasonably necessary or required to meet legal or regulatory requirements, resolve disputes, prevent fraud and abuse, or enforce our terms and conditions, we will also keep hold of some of your information, even if it is no longerneeded to provide our services to you.

Security of your personal data

Transmission of information via the internet is not and cannot be completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our websites; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

What rights do you have?

You have a number of rights under the Data Protection Laws in relation to the way we process your personal data, which are set out below. You may contact us using the details at the beginning of this privacy policy to exercise any ofthese rights.

What if you have a complaint?

If you have any concerns regarding our processing of your personal data, or are not satisfied with our handing of any request made by you, or would otherwise like to make a complaint, please contact our customer contact centre in the first instance using the details at the start of this privacy policy, so that they can do their very best to sort out the problem**.**

You can also contact the Information Commissioner's Office at Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF www.ico.org.uk.

This policy was last reviewed and updated in October 2021.