

Body Beyond Birth GDPR Compliant Privacy Policy

Core Body Business Pty Limited (ABN 29 168 604 215) of PO Box 1, Berowra NSW Australia 2081, trading as Body Beyond Birth (“we”; “us”, “our”) is committed to protecting and respecting your privacy. This Privacy Policy (“policy”) forms part of and is incorporated by reference into Body Beyond Birth’s standard Terms and Conditions, which can be seen by clicking [\[here\]](#). This policy governs the data which we collect from users and other third parties in the course of our business and the way in which we protect and process such information. Please read this policy carefully to understand how we will treat your personal data.

1. Data controller

For the purpose of the General Data Protection Regulation (the “GDPR”), which applies in the UK on May 25, 2018, and other data protection laws applicable in the UK (and other jurisdictions to which GDPR applies), the data controller is [Core Body Business Pty Ltd](#) (ABN 29 168 604 215) of PO Box 1, Berowra NSW 2081, trading as Body Beyond Birth (BBB, we, us, our).

2. Information we may collect about you

Data regarding you and your business is collected, retained and processed subject to and in accordance with the requirements of the GDPR. We may collect personal data, that includes: name, contact information including email address and mailing address, telephone number, demographic information such as postcode, preferences and interests, IP address, other information relevant to customers, offers and/or promotions.

We may collect and process the following data about you: Information you provide when you use our website [www.bodybeyondbirth.com] (the “website”) or other media by which you use our services. This includes information provided by you at the time you place an order for any of our products or services. We may also ask you for information if you report a problem with our website.

If you contact us by email, by telephone or in writing, we may keep a copy of that correspondence or communication.

Details of any transactions you carry out with us through the website or by any other means. Details of your visits to the website and the resources that you access. If you have provided us with the personal data of another person, you confirm that he/she consents to the processing of his/her personal data and that you have informed him/her of our identity as a data controller and provided him/her with a copy of our Terms and Conditions and this policy.

3. IP addresses and cookies

We may collect information about your mobile phone, computer or other device from which you access the website. Such information may include your domain name and IP address, details of your computer operating system and browser, the website you visited prior to visiting our website and unique number identifiers that are automatically generated by our systems when you visit our website. This will include details of the choices you make on our website indicating whether you wish to receive information on other products and services.

Some of this information is retained in “cookie” files on your computer. These files retain useful information that can speed your navigation through frequently visited sites. They can also retain records that track site usage, preferences and passwords. These cookies can be disabled or deleted by activating the setting on your browser if you do not wish them to be used. However, if you select this setting you may be unable to access certain parts of our website. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you log in to our website.

[Please note that our advertisers may also use cookies, over which we have no control.]

4. Legal basis for data processing

We can process personal data on various legal bases. For processing operations for which we obtain consent for a specific processing purpose, Article 6(1)(a) of the GDPR is our legal basis.

If the processing of personal data is necessary for the performance of a contract to which the data subject is party, as for example when processing operations necessary to provide our service, the processing is based on Article 6(1)(b) of the GDPR. The same applies to such processing operations which are necessary for carrying out pre- contractual measures, for example in the case of inquiries concerning our products or services. If our company is subject to a legal obligation by which processing of personal data is required, such as for the fulfilment of tax obligations, our processing is based on Article 6(1)(c) of the GDPR.

Finally, we can base our processing operations on Article 6(1)(f) of the GDPR: this legal basis is used for processing operations which are not covered by the abovementioned legal grounds, if processing is necessary for the purposes of the legitimate interests pursued by our company or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data.

5. Retention of your information

We take appropriate measures to ensure that any information collected from you is kept only for so long as is necessary for the purpose for which such information is used.

We normally update your personal data within seven (7) working days of any new or updated personal data being provided to us, to ensure that the personal data we hold about you is as accurate as possible.

We protect your data by: Offering you a secure transmission method to send us personal or company information.

Implementing security policies and technical measures to protect data from:

- Unauthorised access;
- improper use or disclosure;
- unauthorised modification; and
- unlawful destruction or accidental loss.

6. Uses made of your information

We use the information collected about you for the following purposes:

- To ensure the products and services you have chosen are delivered to you in the most effective way, and to assist with the performance of our internal contract, accounting and administrative functions.
- To carry out our obligations arising from any contracts entered into between you and us.
- To report aggregate information to our advertisers. This is statistical data about our users' browsing actions and patterns and does not identify any individual.
- To assist us in developing new and improved products as indicated by user practice and preferences, based on our analysis of patterns of site usage.
- To provide you with details of changes to our products or of other product offerings which we believe may be of interest to you from Body Beyond Birth or other third-party providers. We will not share your data with third parties for marketing purposes unless we have procured your express consent to do so.

7. Profiling or other automated individual decision making

Automated individual decision making refers to a decision made solely on the basis of automated processing of your personal data, without human involvement. For instance, this means processing using an algorithm or a software code. Profiling is defined as automated processing of personal data to evaluate certain things about an individual: profiling can be part of an automated decision-making process.

We may conduct automated decision making or profiling to better understand your centre of interests and preferences and adapt our communications to your profile. However, we want you to know that you have certain rights in respect of automated decision making and profiling, where that decision produces a legal effect on you. Please see below the section on “Your rights under the GDPR” for more information about your rights.

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9. Disclosure of your information

We may disclose your personal information where applicable to any member of our group, which means our subsidiaries, our ultimate holding company and its subsidiaries as defined in Section 1159 of the UK Companies Act 2006.

We may disclose your personal information to third parties in the following circumstances:

- (a) In the event that we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets.
- (b) If we or substantially all of our assets are acquired by a third party, in which case personal data held about our customers will be one of the transferred assets
- (c) If we are under a duty to disclose or share your personal data to comply with any legal obligation.
- (d) To enforce or apply our Terms and Conditions and other agreements.
- (e) If it is required to do so to deliver our services. We sometimes outsource certain functions of our business to service providers: some of these service providers may use cloud-based systems: in that case, your personal data would be hosted on their servers, but under our direction and control.
- (f) To protect the rights, property or safety of Body Beyond Birth, our customers or others.
- (g) Where we have received your permission for us to do so.
- (h) Any company within the Core Body Business Pty Limited Group (including to its employees and sub-contractors) which assists us in providing the Services or which otherwise has a need to know such information;
- (i) Any third party which assists us in providing the Services, including (but not limited to) payment processors, providers of marketing services, information technology services, social media services.

- (j) Any third party which can assist us in verifying the accuracy of your Personal Information, including financial institutions and credit reference agencies (a record of the search may be retained by such third party), identity verification entities, payment gateways, application programming interfaces.
- (k) Any third party which assists us in monitoring use of the Services, including the detection and prevention of fraud and collusion in order to comply with any applicable law, regulation, legal process or government request;
- (l) Any contractors or other advisers auditing any of our business processes or who have the need to access such information for the purpose of advising us;
- (m) Any law enforcement body which may have any reasonable requirement to access your Personal Information;
- (n) Any regulatory body or authorised entity which may have any reasonable requirement to access your Personal Information; and
- (o) Any potential purchaser of Body Beyond Birth or any investors in it or in any company within our Group (including in the event of insolvency).

If at any time you wish us to stop processing your Personal Information for the above purposes, then you must contact us and we will take the appropriate steps to stop doing so. Please note that this may mean that your Account will be closed. You may contact us by sending an email to hello@bodybeyondbirth.com.

10. Transfers outside the European Economic Area (EEA)

We will only transfer your personal data to countries which are considered as providing an adequate level of legal protection or where alternative arrangements are in place to protect your rights.

We may transfer your personal data outside the EEA in the unlikely event that we receive a legal request from a foreign law enforcement body. All requests for information we receive from these bodies will be carefully checked before personal data is transferred.

We may use remote website server hosts to provide and maintain some aspects of our service and website, which may be based outside the EEA (in "the cloud"). Transfers to service providers outside of the EEA will be protected by contractual commitments and, where appropriate, further assurances, such as certification schemes (including the EU-US Privacy Shield for the protection of personal data transferred from the EU to the US and accessed in the US where we believe it is appropriate to do so from time to time).

You have the right to ask for more information about the safeguards we have put in place as mentioned above.

11. Your rights under the GDPR

- Right of access

The GDPR gives you the right to access information held about you. If you wish to exercise such right, please submit a request to us in writing at hello@bodybeyondbirth.com.

Any access request shall be subject to your providing acceptable proof of identification.

If we are processing your personal data, we will provide you with a copy of that personal data.

If you require additional copies, we may charge a reasonable administrative fee.

- Right of rectification

You are entitled to have your personal data rectified if it is inaccurate or incomplete. You should instruct us to correct or update

any personal data we hold about you (for instance, if you change your address or your name).

You can instruct us to do this at any time by contacting us at hello@bodybeyondbirth.com.

- Right to erasure

You have a right to have your personal data erased and to prevent processing in specific circumstances. If you wish to exercise such right, please submit a request to us in writing at hello@bodybeyondbirth.com.

- Right to restrict processing

In certain circumstances, you have the right to obtain from us restriction of processing (especially when the accuracy of the personal data is contested by you, for a period enabling us to verify the accuracy of the personal data).

- Right to withdraw your consent

In certain circumstances, we must have your consent before we contact you. You have the right to withdraw your consent to processing of your personal data at any time by contacting us at hello@bodybeyondbirth.com.

- Right to data portability

With effect from May 25, 2018, you have the right, in certain circumstances, to obtain personal data you have provided us with, in a structured, commonly used and machine-readable format, and to reuse it elsewhere or ask us to transfer this to a third party of your choice.

- Right to object

You have the right to object to:

- Processing based on legitimate interests or the performance of a task in the public interest/exercise of official authority (including profiling).
- Direct marketing (including profiling).
- Processing for purposes of scientific/historical research and statistics.

- Rights related to automated decision making and profiling

You have the right not to be subject to decision based solely on automated processing, including profiling, which produces legal effects concerning you or similarly significantly affects you, as long as the decision is not necessary for entering into, or the performance of, a contract between you and us; or is not based on your explicit consent.

- Right to lodge a complaint with a supervisory authority

You have a right to lodge a complaint with a supervisory authority, to enforce your rights, as specified above. You can find details about how to do this on the UK Information Commissioner's Office (ICO) website at <https://ico.org.uk/concerns/>. Or other regulatory body responsible for data protection in the relevant jurisdictions.

12. Links to other websites

Our website offers links to many third-party websites. We are not responsible for the accuracy or efficacy of the information or data policies or procedures of these third parties. If you access these sites using the links provided on our website, you should satisfy yourself as to the relevant data policies in effect on these sites.

13. Changes to our privacy policy

Any changes we may make to our Privacy Policy in the future will be posted on this page and on our website. Please check this page occasionally to ensure you are happy with any changes.

If you have any questions about our privacy policy, or if you want to request information about our privacy policy, please contact us at hello@bodybeyondbirth.com or in writing to PO Box 1, Berowra NSW 2081.

14. Contact

If any of your personal data changes, or if you have any questions, comments or requests regarding the protection of your personal data or this policy, please contact us by email at hello@bodybeyondbirth.com or in writing to PO Box 1, Berowra NSW 2081.