**Privacy Policy - Real Challenge**

At Real Challenge, we are committed to safeguarding your privacy. This privacy policy provides information on the processing of personal data by Real Challenge, hereafter Real Challenge, **we** or **us**. We want you to feel secure when we are collecting and sharing your data and therefore, we want you to know how we collect, use, share, and keep the information about you and the choices that are available to you as a data subject. As such, this privacy policy is concerned with how we handle the personal data of clients of Real Challenge (the **Privacy Policy**). The Privacy Policy applies to the Real Challenge website, any online applications that run on smart phones, tablets, and other mobile devices (**Apps**) as well as your use of or access to any of our online services and our webshop.

Your use of our website and services (the **Services**) and any dispute arising over privacy is subject to this Privacy Policy and any of our applicable terms and conditions for the use of our services.

We reserve the right to, at all times, and with or without any particular notification, make changes to this Privacy Policy. We might need to do so in the case of new developments, activities, online services, or when the applicable laws are amended. We therefore advise you to regularly check this Privacy Policy to make sure you are up to date on any possible adjustments.

**1. When does this Privacy Policy apply?**

This Privacy Policy is applicable to the processing of personal data of clients by Real Challenge and possibly other individuals. This Privacy Policy is also applicable to all personal data of clients which is stored and/or processed by Real Challenge on a server in the EU. This Privacy Policy does not apply to the processing of data of employees the context of their employment or assignment relationship at Real Challenge.

When processing personal data of data subjects who are in the EU in connection with our Services, Real Challenge acts as a data controller and as a data processor. When Real Challenge determines the purpose and the manner of processing your personal data, Real Challenge is deemed to be a data controller. We apply a similar approach to protecting your personal data whether we are acting as a data controller or a data processor.

Real Challenge is committed to adequately protecting your personal data in accordance with the applicable laws and regulations, regardless of your location and where we process it. Similarly, we are committed to providing the appropriate protection framework when transferring your data outside of the EEA.

**2. Which types of personal data do we collect and why?**

1. **To deliver you our website’s functionalities and for their technical and functional management**
2. *What does this purpose encompass?*

For any person that accesses and uses our website, we process technical data to be able to offer you all our website’s functionalities and to allow our website’s administrators to manage and improve our website’s performance. If you enter data into our website, such as your location to receive relevant information and functionalities, Real Challenge processes this data to provide you with the requested information or functionalities. Furthermore, we process your personal data in order to allow you to save your data (or preferences) to configure your device. Lastly, Real Challenge uses cookies on its website to ensure you can retrieve information from our website quickly and easily.

1. *What legal ground justifies the processing of personal data for this purpose?*

We process your personal data for this purpose based our legitimate interest. We do so to improve our overall marketing and communication efforts and to inform and update key stakeholders.

1. *Which personal data do we process for this purpose?*

For this purpose, we process any personal data that you have entered into our website yourself, or that is generated by the functionalities described under (i), which includes your IP-address and the internet browser you use. Moreover, we make use of Google Analytics to register the pages you visited on our website, your click- and surf behaviour and the length of your session, yet in a way untraceable to an individual person.

1. *How long will we hold on to your personal data?*

We will store personal data gathered for this purpose for a maximum of 1 year. After this period, we will permanently delete your personal data from our systems.

1. **To allow you to contact us or connect with us (e.g. on social media)**
2. *What does this purpose encompass?*

Real Challenge maintains active accounts on several social media platforms. When you contact us via one of these platforms, we process your personal data in order to answer your queries, to respond to the messages or requests, and subsequently to contact you in relation to any campaigns we might run through these platforms from that point onwards.

Additionally, when you click any of the buttons included on our website to be able to contact us, we will refer you to the website or app of the applicable third party, whether this is your email provider or a social media platform. For more information, read our Cookie Policy.

1. *What legal ground justifies the processing of personal data for this purpose?*

We process your personal data based on a legitimate interest. Being able to communicate with (potential) clients is vital to our business. It can also improve our overall marketing and communication efforts.

1. *Which personal data do we process for this purpose?*

For this particular purpose, we process via the communication channel which you have chosen to use to connect with us, and we process the personal data you used to connect with us and chose to supply to Real Challenge. This includes your (user) name, address, email address, gender, and any additional personal data you included in your message. Moreover, if you accessed our social media through one of the buttons on our website, the relevant third party might place cookies on your device. For more information on this, access our Cookie Policy.

1. *How long will we hold on to your personal data?*

We will store the data collected for this purpose for a maximum of 10 years. After this period, we will permanently delete all this data from our systems.

1. **For answering your questions and handling of complaints**
2. *What does this purpose encompass?*

If you get in touch with us at our office(s), via a contact form, or contact any of our employees in any possible form, we will use your personal data in order to reply to and answer your question or to respond to and handle a complaint.

1. *What legal ground justifies the processing of personal data for this purpose?*

We process your personal data based on consent and legitimate interest. In this case, the legitimate interest is constituted by our intent to carefully deal with your complaints and questions.

1. *Which personal data do we process for this purpose?*

To the end of this purpose we process your name, contact details, your correspondence with Real Challenge about your question or complaint and all other personal data which are necessary to answer your question or to handle your complaint.

1. *How long will we hold on to your personal data?*

We will retain your personal data for as long as we need to execute your request or handle the complaint, plus a maximum of 1 month, after which the data will be deleted from our systems.

1. **To ensure correct enforcement and respect of your rights included in this Privacy Policy**
2. *What does this purpose encompass?*

As a result of the rights you have as a person whose personal data is processed by us, which can be found in Section 7 of this Privacy Policy, we process your personal data in order to execute and administer your requests to us in relation to these rights. For example, if you want to exercise your right to be forgotten, we need to register a minimum amount of data in order to make sure that we do not contact you anymore.

1. *What legal ground justifies the processing of personal data for this purpose?*Processing of this personal data is based on our legitimate interest. The legitimate interest we have is that we intent to respect your choices and thus, we want to ensure that if you exercise your right to be forgotten, we will never contact you again for any purpose.
2. *Which personal data do we process for this purpose?*

For this purpose, we process contact details such as your address and email address, and personal details such as your name.

1. *How long will we hold on to your personal data?*

Due to the nature of this purpose, we need to hold on to this data for an unlimited period.

1. **For the conclusion and execution of agreements with clients**
2. *What does this purpose encompass?*

We use personal data for the purpose of entering into relationships with (prospective) Real Challenge clients, and to perform any contractual obligations under the contract that we have with clients. We process your personal data for administrative purposes, such as sending invoices. We might also use your personal data for the implementation and execution of our Services and challenges. The agreement comes into force from the moment the client creates an account and accepts our terms and conditions. When you place an order on our website or in our webshop, we may request you provide additional information such as a billing address and phone number.

1. *What legal ground justifies the processing of personal data for this purpose?*

We process personal data for this purpose based on our contract with you and legitimate interest. We do so on the basis of the contract that you have engaged in with Real Challenge relating to the provision of the specific service between you and Real Challenge. Our legitimate interest to process your data follows from our intent to comply with applicable law.

1. *Which personal data do we process for this purpose?*

For this purpose, we process your contact details such as your address, phone number, and email address, personal details such as name and date of birth, payment and credit information, tax information, order history and other data stored in our database with all relationships of Real Challenge.

1. *How long will we hold on to your personal data?*

Your personal data will be hold on to for 7 years after the end of our relationship with you. After this term, your personal data will be deleted from our systems.

1. **For relationship management and marketing**
2. *What does this purpose encompass?*

Real Challenge could possibly use the information stored in its contractual relationship database to send you newsletters, as well as to provide customer services and perform account management. We also use your personal data for the development, execution, and analysis of market surveys and marketing strategies.

1. *What legal ground justifies the processing of personal data for this purpose?*

We process your personal data for this purpose based on your consent. You can withdraw your consent at any time, without this affecting the lawfulness of processing based on consent before withdrawal.

1. *Which personal data do we process for this purpose?*

For this purpose, we process you contact details such as your address and email address, personal details such as your name and date of birth, contact preferences, payment information, order history, and correspondence with us.

1. *How long will we hold on to your personal data?*

Personal data will be retained for a maximum of 10 years after the termination of our relationship. After this term, your personal data will be deleted from our systems.

1. **To protect health and safety**
2. *What does this purpose encompass?*

Due to the nature of our Services, we maintain high standards when it comes to your health and safety. When it is necessary to process our personal data to protect your vital interests, we will do so. This could be, for example, a specific interest in dieting or a medical condition.

1. *What legal ground justifies the processing of personal data for this purpose?*

We process this personal data on the basis of your consent and our legitimate interest. Our legitimate interest is to ensure your safety, security, and health.

1. *Which personal data do we process for this purpose?*

For this purpose, we will process health data, medical data, and diet data, and any other demographic information relating to your physical or mental health or condition, such as height and weight.

1. *How long will we hold on to your personal data?*

We will hold on to this personal data for as long as you use our Services plus a maximum of 1 year.

**3. Cookies**

We also collect information about you by using cookies. Read more about the manner in which we use cookies in our Cookie Policy.

**4. Special personal data**

We insist on not processing any personal data of minors, unless this is explicitly consented to by a parent or legal guardian. However, as it is hard to detect whether we are doing so, we strongly encourage you to inform us if you have reason to believe we process the personal data of a minor. We will delete this personal data instantly.

**5. Who has access to your personal data?**

Real Challenge is committed to securing your personal data and has taken the necessary steps in this regard. Only our employees, interns, and volunteers are authorised to access personal data, yet, only to the extent necessary to properly perform their individual jobs.

With every third party who, on our behalf, processes personal data, we have entered into the required data processing agreements. Real Challenge only shares personal data with third parties if it is necessary to serve its applicable purpose as set out above. In all cases, we will ensure that third parties with access to your personal data have implemented appropriate technical and organizational safeguards to maintain our envisioned level of privacy and security. We furthermore insist that all data protection and privacy laws are adhered to at all times.

We undertake to have data processing agreements in place with all third parties who process your personal data on our behalf. In any case, we ensure that these third parties have at least the same level of technical and organizational safeguarding measures implemented as we have done.

If your personal data is transferred to a recipient in a country outside the EEA or where an adequate level of protection of personal data is not provided for, Real Challenge will take measures to ensure that your personal data is adequately protected in those countries as well, such as entering into the EU Standard Contractual Clauses with these third parties.

When a third party processes your personal data, they can only do so following Real Challenge’s instructions. They therefore act as our data processor. We enter into the necessary agreement with the data processing where we include obligations to ensure your personal data is processed solely in order for the data processor to fulfil its duty to provide services to us.

In any other case, your personal data will not be supplied to third parties, except where mandated by law.

**6. Security**

Your personal data will be stored securely at all times. We value the protection of your privacy. We treat personal data very carefully, and, possibly together with third parties, we ensure that appropriate organisational and technical protection measures are implemented to safely store personal data. In this manner, we ensure that the personal data is only accessible to those particular individuals who are authorized based on their job function, and therefore is only used for its intended purpose. Additionally, we have implemented measures to guarantee your safe visit to and use of our websites. In doing so, we prevent any abuse of your data. These measures include computer safeguards and secured files and facilities.

Our websites have a certified Secure Socket Layers (SSL) certificate. This is the standard security technology for establishing an encrypted link between a web server and a browser. This link ensures that all data passed between the web server and browsers remain private and integral. Your financial transactions are managed by payment services providers that use secure technology systems. Our servers are protected by an UFW firewall.

Real Challenge has taken the necessary technical and organizational measures to prevent, signal, rapport, and handle any breach in its data protection. In the event that a data breach does occur, however, Real Challenge will, without undue delay, and where feasible, not later than 72 hours after having become aware of it, notify the personal data breach to the relevant Data Protection Authority.

**7. Accessing, correcting or removing personal data**

You have the right to access, correct, or remove your personal data that we have stored. You also have the right to withdraw your previously given consent to the processing of your personal data, or to object to the processing of your personal data by Real Challenge. Finally, you have the right to have a file sent to you, containing details of which of your personal data we have stored. You can send us a request to receive such a file in writing. Any request is subject to the applicable law, which means that we might need to keep the personal data stored.

We also want to inform and remind you of the ability to issue a formal complaint at the national Data Protection Authority.

If you object to Real Challenge using your personal data, want your personal data to be forgotten, want to withdraw your previously given consent to process your personal data, or you have a different enquiry concerning your personal data, you can at any time send a request to:

Real Challenge

V/d Bergh v Eysingaplants 97

2082 XE Santpoort Zuid

0611163636

Realchallenge.fit@outlook.com

**External links**

Our website could sometimes display links to other websites. We are not responsible for the privacy policy that this other website adheres to, nor its content. We advise you to inform yourself by reading the privacy policies on these websites.

**Any questions?**

In the event you still have questions after reading this Privacy Policy, or when you have any suggestions or comments about its content, you can always contact us at: Realchallenge.fit@outlook.com