

## Privacy Policy

Last updated 18 June 2019

### 1. Summary

This privacy policy tells you what to expect with regards to the data provided to and collected by Lifefyle.

**It is important to note that we are not in the business of selling or renting information, and we are committed to protecting the privacy of your data.**

We only will only disclose information to a Legal or Regulatory body, and only if we are required to by law. In these instances, we will disclose the minimum information necessary to fulfil our legal obligation.

### 2. How we handle data you upload to your Lifefyle account

We cannot offer and support a valuable bespoke service without having some access to your data. However, your personal data is only accessed in exceptional circumstances when requested by you - i.e. if you have a usage query which you raise to Member Support, and we need to access your data to respond fully to the query.

Outside of this, data is analysed and processed by the algorithms within our platform without being seen by any of our personnel. By “processing” we mean our platform will: identify the document type; propose a filename; propose a storage location; identify key dates.

We restrict access to users’ Lifefyle accounts to within our rigorously vetted Member Support Team, and within that, only those who need to know that information in order for us to process it on your behalf. All of our Member Support Team are subject to strict confidentiality obligations and will be disciplined or contractually terminated if they fail to meet these obligations.

#### **Algorithm & Usage Data**

From time to time, we will run randomised and anonymised analysis on the data that is processed through our algorithms and stored within our members’ Lifefyle accounts. We do this to enhance our algorithms and build our understanding of how the platform is being used to ensure we continue to provide a relevant and useful service. In these instances, common document formats, names and storage locations will be analysed, not the personal contents of any documentation.

We use MongoDB to process this data. We have implemented strict access controls and encryption to secure our MongoDB deployment. Data held within MongoDB is anonymised and encrypted at rest. It includes tags, entity parameters and log data rather than any members’ documentation.

### 3. How the data you upload to your Lifefyle account is stored

Lifefyle is currently a mobile responsive website and mobile application, hosted on the Google Cloud Platform (GCP) and stored in Google Cloud Storage. Data is only accessible via the Lifefyle console by authorised Lifefyle Member Support personnel. Google have no access to your data.

#### a. Encryption

Data for active Lifefyle accounts is stored in GCP. This enables us to ensure your data is protected using Google's built-in encryption features so that it is encrypted both in transit and at rest.

#### b. Storage

We use a variety of storage options available on GCP, including local disks, persistent disks and Google Cloud Storage buckets. We also take advantage of Google Cloud's cryptographic erasure processes to ensure that any changes to our storage structure does not result in exposing private account data.

#### c. Back-ups

We take a snapshot of the Lifefyle databases every 2 hours to enable us to restore any users' account in the unlikely event that we should need to. These are stored in Google's Snapshot Repository on GCP for a maximum of 24 hours.

We take a full back-up of Lifefyle every night. These back-ups are encrypted and stored for 14 days.

#### d. Cold Storage

We are motivated by decluttering people's lives physically, emotionally and digitally so we aim to highlight only the data you really need in your Lifefyle account. This will ensure search speed, search accuracy and storage requirements are optimised.

In the event that data is not accessed for a long period, we will archive dormant files using Google's secure Archival Cloud Storage. This data will still be subject to our strict security and privacy rules, and will be accessible by the user as needed. We will continually review our processes and algorithms to ensure that the rules we implement to trigger transfer of data to Cold Storage are appropriate and useful to our users.

#### e. Cancellations

Should you cease to renew your membership of Lifefyle, unless we receive a specific written request for an alternative course of action, any information saved within your personal Lifefyle Members area will be retained for three years. After 3 years, it will be permanently deleted. It will not be shared with any other individual or organisations.

For full details of the cancellation procedure, please see our **Terms of Service**.

## 4. Payments

No payment card information is held within the Lifefyle systems.

All payments via in-app purchases are handled by your mobile operating system provider. In these cases, we have no access to the payment information for an individual customer, simply receiving confirmation of a particular subscription being paid, from the App Store or Google Play.

For more information about how the App Store handles in-app purchases, please visit <https://www.apple.com/legal/internet-services/itunes/uk/terms.html>

For more information about how Google Play handles in-app purchases, please visit [https://play.google.com/intl/mt\\_mt/about/play-terms/](https://play.google.com/intl/mt_mt/about/play-terms/)

Any payments direct to Lifefyle - ie for those members who upgrade on our web platform rather than via the app - are handled by Stripe. Stripe provides the technical, fraud prevention, and banking infrastructure required to operate on-line payment systems. For information about their products and data protection & security policies, please visit <https://stripe.com/gb>.

A limited number of our vetted Finance team have access to our Stripe dashboard, through approved devices, with 2 Factor Authentication enabled. Through this, we are able to see which members have signed up to Lifefyle, which subscription they have selected, and whether or not they have redeemed any promotional codes. We are able to track and edit billings and invoices, and can see the card type and expiry date of a members' payment card.

We are not able to view the card number, CCV, or any personal information other than the email address used to register with Lifefyle.

## 5. Two Factor Authentication

Security is of utmost importance to us. Our business would not be viable if we did not keep on top of the highest grade security measures possible. We regularly engage with Cyber Security experts and Penetration Testers to perform ethical hacking activities on our website and product to ensure we are doing everything we can to keep your data safe.

We encourage our members to do their bit too, and enable 2 Factor Authentication to further protect access to their Lifefyle account.

We offer 2 Factor Authentication through a third party called Twilio, and authentication codes are, in turn, validated by their partner Authy. Lifefyle does not have access the phone number or email address you provide to receive your authorisation codes to.

To read more about how these businesses work, please refer to their websites: [www.twilio.com](http://www.twilio.com) and <https://authy.com/>.

## 6. Data we collect or receive in other ways

Our users contact us in a variety of ways about a multitude of subjects. This section explains our general principles regarding how we treat data, content and contact from users and anyone else outside of our organisation.

### a. Visitors to our website

We will collect standard internet log information and details of visitor behaviour patterns to our website [www.lifefyle.com](http://www.lifefyle.com). We do this using Google Analytics, to find out things such as the number of visitors to the various parts of the site. This information is processed in a way which does not identify anyone. We do not make any attempt to find out the identities of those visiting our website.

If we ever want to collect personally identifiable information through our website, we will be up front about this. We will make it clear when we collect personal information and will explain what we intend to do with it at that time.

### b. Social Media contact

If you send us a private or direct message via social media, the message will be stored by us for as long as we deem necessary to deal with the contents of the message. It will not be shared with any other organisations without us obtaining your express permission to do so.

This covers: LinkedIn, Twitter, Instagram and Facebook

We use Hootsuite to schedule, post and track the performance of content on our social media platforms. Hootsuite tells us how many hits each post has had, when those hits were, and the device type that was used. It does not provide us with any information that could be used to personally identify any individual.

### c. Emails sent to us @lifefyle.com

Any email sent to us, including any attachments, may be monitored and used by us for reasons of security and for monitoring compliance with office policy. The email will be stored by us for as long as we deem necessary to deal with its contents. It will not be shared with any other organisations without us obtaining your express permission to do so.

Email monitoring or blocking software may also be used.

Please be aware that you have a responsibility to ensure that any email you send to us is within the bounds of the law.

### d. Live web chat

Our live web chat is provided through Tawk. This facility gives us the ability to see which members are online on [app.lifefyle.com](http://app.lifefyle.com) at any point in time. This enables our Member Support team to contact you, or respond to queries from you, during your live session on Lifefyle.

While the facility is available, the Lifefyle team have a conduct policy not to make unsolicited contact with members, via Tawk, while they are online. Contact can therefore only be made if a member initiates a Tawk conversation from their session.

Member support web chat transcripts are kept by Lifefyle for as long as we deem necessary to deal with its contents. Once the query is fully resolved, only the subject of the enquiry, the resolution and the time statistics of the interaction are kept. This is to help us understand when and what members are using Member Support for as this will help us improve the quality and relevance of the services we offer.

If no Member Support agents are online when a member opens a conversation, the Member Support team are alerted to this by email, with a transcript of the members' message(s). This allows us to respond appropriately once an agent is available.

Through our Tawk dashboard, we are also able to view Lifefyle's usage statistics on an aggregated level, not on an individual member level.

If you would like to read more about how Tawk works, and understand their privacy policy and data protection commitments, please visit their website: [www.tawk.to](http://www.tawk.to).

**e. Analytics (and Cookies)**

In order to ensure we are offering a product and service which is continuously improving and is relevant and helpful to our users, we use Google Analytics to identify trends and patterns about how the Lifefyle platform is being used.

Where it is available, we use the following information about our users: age; gender; location; number of connected users; devices used to access Lifefyle; timings and patterns of which parts of the Lifefyle system are used..

All of this data is anonymised and stored in such a way that it could never be linked to a specific user account or used to identify you.

Google Analytics uses Cookies. To learn more about how Google Analytics uses Cookies, which is therefore, how Cookies are used on our website and platform, read the [Google Analytics Privacy Policy](#).

**f. Complaints**

Lifefyle aims to meet the highest standards with regard to your personal information. For this reason, we will take any complaints we receive about this very seriously. We encourage people to bring it to our attention if they think that our collection or use of information is unfair, misleading or inappropriate.

Should we receive a complaint from a person we would make up a file containing the details of the complaint. This normally contains the identity of the complainant and any other individuals involved in the complaint.

We will only use the personal information we collect to process the complaint and to check on the level of service we provide. We will compile and publish statistics showing information like the number of complaints we receive, but not in a form which identifies anyone.

Complaint files will be retained in a secure environment and access will be restricted according to the 'need to know' principle.

## **7. How we store data we receive or collect**

At Lifefyle, we have implemented Google's G Suite as our internal productivity suite. This means that all company data, and data used to run our day-to-day business operation, is stored within a private Lifefyle G Drive hosted on Google Cloud Platform (GCP).

You can learn more about the security and privacy practices of GCP here: <https://cloud.google.com/security/>

Only employees of Lifefyle have access to our G Drive, and access to sub-folders within our G Drive is granted on a role specific 'need-to-know' basis.

In the rare event that we choose to collaborate with a trusted Third Party in order to improve our products and services to support our users, we create a secondary secure folder on Google Drive to hold data that needs to be accessible by both parties. With the exception of anonymised, consolidated usage trend and pattern data as described in Section 4e of this document, user data will never be held in these collaboration folders.

## **8. Regulations**

Lifefyle is a UK Limited company, registered with Companies House, compliant with The Companies Act 2006, and governed by the laws of England and Wales.

In accordance with the Data Protection Act 2018, Lifefyle is registered as a data controller with the Information Commissioner's Office (ICO) and is GDPR compliant.

## **9. Legal Disclosures**

At Lifefyle, we are obsessed with security and protecting the privacy of our users' accounts. We will not disclose your information to anyone unless we are legally obliged to do so. Even then, we will disclose only the minimum amount of information required to satisfy the explicit details in the warrant or request.

We will make every attempt to notify you in advance if we believe we are duty-bound to comply with a Third Party's legal demand for your information.

## **10. Queries**

This privacy notice was drafted with brevity and clarity in mind. It does not provide exhaustive detail of all aspects of Lifefyle's data handling processes. However, we are happy to provide any additional information if specified and requested, in writing, to Member Support, Lifefyle Ltd, Ibox House, 162-164 Arthur Road, Wimbledon, London, SW19 8AQ.

#### **Access to personal information**

Lifefyle's ethos is to create peace of mind for people. We are therefore as open as we can be in terms of giving people access to their own personal information. Individuals can find out the details of any personal data we hold by making a 'subject access request', in writing, under the Data Protection Act 1998.

It is extremely unlikely that we hold any identifiable personal information about you, other than what you have visibility of within your personal Lifefyle account. However in an instance that we do, we will: provide you with a description of the data; explain why we are holding it and how long we intend to hold it; confirm who it could be disclosed to (if anyone); provide you with a copy of the data.

#### **11. Links to other websites**

This privacy notice does not cover any links within our website or the Lifefyle product linking to other websites. We encourage you to read the privacy statements on the other websites you visit.

#### **12. Updates**

We keep our privacy notice under regular review. This privacy notice was last updated on 18 June 2019.