

PRIVACY POLICY

Still Strong Boutique Gym B.V.

YOUR STRENGTH SANCTUARY

1. INTRODUCTION

Still Strong Boutique Gym B.V., trading under the name **Still Strong Boutique Gym**, respects the privacy of its members, visitors and users of its services.

This Privacy Policy explains which personal data Still Strong Boutique Gym collects, why this data is processed, how it is protected, how long it may be retained and what rights you have regarding your personal data.

Still Strong Boutique Gym processes personal data in accordance with the **General Data Protection Regulation (GDPR/AVG)** and other applicable Dutch privacy legislation.

2. WHO IS RESPONSIBLE FOR YOUR PERSONAL DATA?

Still Strong Boutique Gym B.V. is responsible for the processing of personal data in connection with memberships, reservations, access, payments, communication and the use of Still Strong Boutique Gym facilities and services.

Visseringlaan 19

2288 ER Rijswijk

The Netherlands

Questions or requests regarding privacy can be submitted to Still Strong Boutique Gym through the contact details provided on our website or through our regular communication channels.

3. PERSONAL DATA WE MAY PROCESS

Depending on the services you use, Still Strong Boutique Gym may process the following personal data:

- Full name
- Address
- Date of birth
- Email address
- Telephone number
- Membership information
- Membership type
- Reservation and training history
- Payment and billing information
- Access information and access logs
- App/account information
- Communication with Still Strong Boutique Gym
- Information provided during registration or an intake
- Training preferences and relevant training information
- Camera images where camera surveillance is used
- Technical information necessary for the website, app or access system
- Other personal information voluntarily provided by the Member

Still Strong Boutique Gym only collects personal data that is reasonably necessary for the relevant purpose.

4. HEALTH AND FITNESS INFORMATION

In certain situations, Still Strong Boutique Gym may receive information relating to a Member's health, injuries, physical limitations or other circumstances relevant to safe participation in training.

Health information is considered sensitive personal data and will therefore be handled with additional care.

Such information will only be processed where there is an appropriate legal basis and where processing is necessary and permitted by applicable law.

Members are requested not to provide more medical information than reasonably necessary for the relevant service.

Where physiotherapy, exercise therapy or another healthcare treatment is provided by a separate healthcare practice or healthcare provider, the processing of medical information relating to that treatment may fall under the privacy policy and professional obligations of that healthcare provider.

5. PURPOSES OF PROCESSING

Still Strong Boutique Gym may process personal data for the following purposes:

- Creating and managing memberships
- Registering Members
- Managing reservations and fixed training time slots
- Providing access to the building and gym
- Managing personal access credentials
- Processing membership payments and other purchases
- Managing cancellations, credits and attendance
- Providing Personal Training, coaching, PRO or other purchased services
- Communicating with Members
- Providing important information regarding memberships or reservations
- Customer service and handling complaints
- Maintaining the safety and security of Members, staff and property
- Preventing and investigating misuse of access
- Maintaining administrative and financial records
- Complying with legal obligations
- Establishing, exercising or defending legal claims
- Improving the services and operation of Still Strong Boutique Gym

6. LEGAL BASIS FOR PROCESSING

Still Strong Boutique Gym processes personal data only where there is a valid legal basis.

Depending on the processing activity, this may include:

Performance of a contract - where processing is necessary to provide a membership, reservation, service or other agreement.

Legal obligation - where Still Strong Boutique Gym is required by law to process or retain certain information.

Legitimate interest - where processing is reasonably necessary for purposes such as security, fraud prevention, access control, administration or the protection of Still Strong Boutique Gym and its Members, provided that the privacy interests of the individual do not outweigh those interests.

Consent - where consent is required by law, for example for certain optional communications, cookies or specific processing activities.

Where processing is based on consent, consent may be withdrawn at any time. Withdrawal does not affect the lawfulness of processing that took place before consent was withdrawn.

7. MEMBERSHIP AND RESERVATION DATA

Still Strong Boutique Gym processes membership and reservation information to manage memberships and ensure that Members can use their reserved training times.

This may include information regarding:

- Membership type
- Fixed training days and times
- Reservations
- Cancellations
- No-shows
- Training credits
- Membership status
- Start and end dates
- Access rights

This information may also be used where necessary to enforce the General Terms & Conditions and House Rules of Still Strong Boutique Gym.

8. ACCESS SYSTEM AND ACCESS LOGS

Still Strong Boutique Gym may use an electronic access system, app, digital key, QR code, access tag or similar technology.

For security and operational purposes, the access system may register information such as:

- Identity or Member account
- Date and time of access
- Successful or unsuccessful access attempts
- Access permissions
- Technical information necessary to operate the access system

Access information may be used to protect Members and property, investigate suspected misuse and enforce access rules.

Access credentials are strictly personal.

9. CAMERA SURVEILLANCE

Camera surveillance may be used in or around Still Strong Boutique Gym where reasonably necessary for the security of Members, staff, visitors, equipment and property and for the prevention or investigation of incidents.

Camera surveillance will not be used in areas where individuals have a high expectation of privacy, such as changing or sanitary areas.

Camera images will only be accessed where necessary by authorized persons.

Images will not be retained longer than reasonably necessary unless an incident, investigation or legal obligation requires relevant footage to be retained for a longer period.

Where required, the presence of camera surveillance will be clearly indicated.

10. PAYMENTS

Still Strong Boutique Gym may process payment information necessary to administer memberships, purchases and outstanding amounts.

Payments may be processed through external payment service providers.

Still Strong Boutique Gym does not process or retain more financial information than is necessary for payment administration and compliance with legal obligations.

11. APP, SOFTWARE AND SERVICE PROVIDERS

Still Strong Boutique Gym may use external service providers for services such as:

- Membership administration
- Reservation systems
- Gym or training apps
- Access control
- Payment processing
- Email and communication
- Website hosting
- Cloud storage
- IT services
- Accounting and administration

Where these providers process personal data on behalf of Still Strong Boutique Gym, appropriate contractual and privacy arrangements will be made where required.

Service providers may only process personal data for the purposes for which they have been engaged, unless they have an independent legal basis for processing.

12. SHARING PERSONAL DATA

Still Strong Boutique Gym does not sell personal data.

Personal data may only be shared with third parties where this is necessary and legally permitted, for example with:

- IT and software providers
- Payment providers
- Access-control providers
- Accountants or administrative service providers
- Professional advisers
- Healthcare providers where applicable and legally permitted
- Government authorities or law enforcement agencies where legally required

Only the personal data reasonably necessary for the relevant purpose will be shared.

13. INTERNATIONAL DATA TRANSFERS

Where a service provider processes personal data outside the European Economic Area (EEA), Still Strong Boutique Gym will take appropriate measures where required to ensure that personal data receives an adequate level of protection in accordance with the GDPR.

14. RETENTION OF PERSONAL DATA

Still Strong Boutique Gym does not retain personal data longer than necessary for the purpose for which it was collected, unless a longer retention period is required or permitted by law.

Retention periods may vary depending on the type of information and the reason for processing.

For example, certain financial and administrative records may need to be retained for statutory tax or accounting purposes.

When personal data is no longer required, it will be deleted, anonymised or otherwise securely disposed of where appropriate.

15. SECURITY

Still Strong Boutique Gym takes appropriate technical and organisational measures to protect personal data against:

- Unauthorized access
- Loss
- Theft
- Accidental destruction
- Unlawful processing
- Unauthorized disclosure
- Alteration or misuse

Access to personal data is limited to persons who reasonably require access for their work or the provision of services.

No method of electronic storage or transmission can guarantee absolute security. Still Strong Boutique Gym therefore regularly considers whether its security measures remain appropriate.

16. YOUR PRIVACY RIGHTS

Under the GDPR, you may have the right to:

- Request access to your personal data
- Request correction of inaccurate personal data
- Request deletion of your personal data where legally applicable
- Request restriction of processing
- Object to certain processing activities
- Withdraw consent where processing is based on consent
- Request data portability where applicable
- Submit a complaint to the competent supervisory authority

Still Strong Boutique Gym may request appropriate information to verify your identity before processing a privacy request.

Certain rights are not absolute. Still Strong Boutique Gym may be required or permitted to retain or continue processing certain information despite a request, for example because of a legal obligation or legal claim.

17. MARKETING COMMUNICATIONS

Still Strong Boutique Gym may send service-related communications that are necessary for the performance of a membership or service, such as information regarding reservations, payments, access, changes to opening hours or membership-related matters.

Marketing communications will only be sent where legally permitted.

Where consent is required for marketing, Members can withdraw that consent at any time.

18. WEBSITE AND COOKIES

The website of Still Strong Boutique Gym may use cookies or similar technologies necessary for the operation and security of the website.

Where analytics, advertising, tracking or other non-essential cookies are used, information and consent will be requested where required by applicable law.

Cookie preferences can be changed or withdrawn where the website provides this functionality.

19. CHILDREN

The services of Still Strong Boutique Gym are not intended to result in the unnecessary collection of personal data from children.

Where personal data relating to minors is processed, Still Strong Boutique Gym will take into account the additional protections required under applicable law.

Where parental or guardian consent is legally required, such consent must be obtained before the relevant processing takes place.

20. DATA BREACHES

If a personal data breach occurs, Still Strong Boutique Gym will assess the incident and take appropriate measures.

Where legally required, a personal data breach will be reported to the competent supervisory authority and, where applicable, affected individuals will be informed.

21. COMPLAINTS

Questions or complaints regarding the processing of personal data may first be submitted directly to Still Strong Boutique Gym.

Members and other individuals also have the right to submit a complaint to the **Dutch Data Protection Authority (Autoriteit Persoonsgegevens)** where applicable.

22. CHANGES TO THIS PRIVACY POLICY

Still Strong Boutique Gym may amend this Privacy Policy when necessary due to changes in legislation, services, technology or business operations.

The most recent version will be made available through the website or other appropriate communication channels.

Where a change materially affects the way personal data is processed, Still Strong Boutique Gym will provide additional notice where required.

23. CONTACT

For questions, requests, complaints, or the exercise of your privacy rights regarding the processing of personal data, please contact:

Visseringlaan 19 2288 ER Rijswijk The Netherlands Email: info@stillstrongboutiquegym.nl

Privacy requests can be submitted by email. Still Strong Boutique Gym may request additional information where reasonably necessary to verify the identity of the person making the request.